Your claim can be filed electronically on Verita's website at https://www.veritaglobal.net/appletree.

United States Bankruptcy Court for the District of Delaware

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- ☐ Apple Tree Life Sciences, Inc. (Case No. 25-12177)
- ☐ ATP Life Science Ventures, L.P. (Case No. 25-12178)
- ☐ ATP III GP, Ltd. (Case No. 25-12179)
- ☐ Apertor Pharmaceuticals, Inc. (Case No. 25-12201)
- ☑ Initial Therapeutics, Inc. (Case No. 25-12202)
- ☐ Marlinspike Therapeutics, Inc. (Case No. 25-12203)
- ☐ Red Queen Therapeutics, Inc. (Case No. 25-12204)
- ☐ Evercrisp Biosciences, Inc. (Case No. 26-10000)
- ☐ Nine Square Therapeutics, Inc (Case No. 26-10001)
- ☐ Nereid Therapeutics Incorporated (Case No. 26-10048)

Modified Official Form 410
Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. **Who is the current creditor?**
   Dr. Susan Lyman
   Name of the current creditor (the person or entity to be paid for this claim)
   Other names the creditor used with the debtor _____

2. **Has this claim been acquired from someone else?**
   ☑ No
   ☐ Yes. From whom? _____

3. **Where should notices and payments to the creditor be sent?**
   Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

   Where should notices to the creditor be sent?
   Nicolas O'Connor
   Name
   11 Dupont Circle NW, Suite 600
   Number Street
   Washington DC 20026
   City State ZIP Code
   United States
   Country
   Contact phone 202-299-1140
   Contact email oconnor@katzbanks.com

   Where should payments to the creditor be sent? (if different)
   Name
   Number Street
   City State ZIP Code
   Country
   Contact phone _____
   Contact email _____

   Uniform claim identifier (if you use one):
   _____

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4. **Does this claim amend one already filed?**
   ☑ No
   ☐ Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. **Do you know if anyone else has filed a proof of claim for this claim?**
   ☑ No
   ☐ Yes. Who made the earlier filing? _____



25122022607100000000000007

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?**
   - ☑ No
   - ☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ___ ___ ___ ___

7. **How much is the claim?**
   $ 1,290,000. **Does this amount include interest or other charges?**
   - ☑ No
   - ☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?**
   Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
   Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
   Limit disclosing information that is entitled to privacy, such as health care information.
   Wrongful termination in violation of California law - discrimination and retaliation

9. **Is all or part of the claim secured?**
   - ☑ No
   - ☐ Yes. The claim is secured by a lien on property.

   Nature of property:
   - ☐ Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
   - ☐ Motor vehicle
   - ☐ Other. Describe: _____

   Basis for perfection: _____
   Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

   Value of property: $_____
   Amount of the claim that is secured: $_____
   Amount of the claim that is unsecured: $_____ (The sum of the secured and unsecured amount should match the amount in line 7.)

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   Amount necessary to cure any default as of the date of the petition: $_____

   Annual Interest Rate (when case was filed)_____%
   - ☐ Fixed
   - ☐ Variable

10. **Is this claim based on a lease?**
    - ☑ No
    - ☐ Yes. **Amount necessary to cure any default as of the date of the petition.** $_____

11. **Is this claim subject to a right of setoff?**
    - ☑ No
    - ☐ Yes. Identify the property: _____

12. **Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☑ No

☐ Yes. *Check all that apply:*

	Amount entitled to priority
☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	$_____
☐ Up to $3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	$_____
☐ Wages, salaries, or commissions (up to $17,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	$_____
☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	$_____
☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	$_____
☐ Other. Specify subsection of 11 U.S.C. § 507(a)(__) that applies.	$_____

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

13. **Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?**

☑ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

$_____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☑ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 07/10/2026
MM / DD / YYYY

DocuSigned by:
Nicolas O'Connor
CB1C26980AC9463...
Signature

Print the name of the person who is completing and signing this claim:

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Name: Nicolas (First name) Enrique (Middle name) O'Connor (Last name)

Title: Senior Associate

Company: Katz Banks Kumin LLP
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address: 11 (Number) Dupont Circle NW, Suite 600 (Street)
Washington (City) DC (State) 20026 (ZIP Code) (Country)

Contact phone: 202-299-1140 Email: oconnor@katzbanks.com

docusign

Certificate Of Completion

Envelope Id: 5A2CA536-95ED-89A8-8168-4658B9E86EFA
Status: Completed
Subject: Complete with Docusign: 260710 - Lyman, Susan Form 410 Proof of Claim (unsigned).pdf
Source Envelope:
Document Pages: 3
Signatures: 1
Certificate Pages: 1
Initials: 0
AutoNav: Enabled
EnvelopeId Stamping: Enabled
Time Zone: (UTC-05:00) Eastern Time (US & Canada)

Envelope Originator:
Nicolas O'Connor
11 Dupont Circle NW
Suite 600
Washington, DC 20036
oconnor@katzbanks.com
IP Address: 108.20.137.240

Record Tracking

Status: Original
7/10/2026 1:04:44 PM
Holder: Nicolas O'Connor
oconnor@katzbanks.com
Location: DocuSign

Signer Events	Signature	Timestamp
Nicolas O'Connor oconnor@katzbanks.com Associate Katz Banks Kumin Security Level: Email, Account Authentication (None)	DocuSigned by: Nicolas O'Connor CB1C26980AC9463... Signature Adoption: Pre-selected Style Using IP Address: 108.20.137.240	Sent: 7/10/2026 1:05:11 PM Viewed: 7/10/2026 1:05:18 PM Signed: 7/10/2026 1:05:36 PM

Electronic Record and Signature Disclosure:
Not Offered via Docusign

In Person Signer Events	Signature	Timestamp

Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	7/10/2026 1:05:11 PM
Certified Delivered	Security Checked	7/10/2026 1:05:18 PM
Signing Complete	Security Checked	7/10/2026 1:05:36 PM
Completed	Security Checked	7/10/2026 1:05:36 PM

Payment Events	Status	Timestamps

EXHIBIT

A

KATZ BANKS KUMIN

Marilyn Gabriela Robb, Senior Associate
Phone: (202) 299-1140
Email: robb@katzbanks.com

By Electronic Mail
June 13, 2024

Intake Unit
California Civil Rights Department
651 Bannon Street, Suite 200
Sacramento, CA 95811.
contact.center@calcivilrights.ca.gov

Re: Susan Lyman v. Initial Therapeutics

Dear Intake Officer:

On behalf of my client, Susan Lyman, enclosed for filing please find Ms. Lyman's Intake Form regarding her complaint against Initial Therapeutics, Inc.

The respondent has most recently been represented in this matter by Sara Moore of Gordon Rees Scully Mansukhani. Should you require it, her email address is smoore@grsm.com.

Because our law firm represents Ms. Lyman in this matter, I ask that the Civil Rights Department direct any communications regarding Ms. Lyman's charge to me. If you need any further information, feel free to contact me at (202) 299-1140 or robb@katzbanks.com.

Sincerely,

Marilyn Gabriela Robb
Attorney for Susan Lyman

Encl.

cc: Susan Lyman

INTAKE FORM / EMPLOYMENT

Civil Rights Department

If you would like CRD to consider your complaint for investigation, complete this form and email it to: contact.center@calcivilrights.ca.gov or mail it to: 651 Bannon Street, Suite 200, Sacramento, CA 95811. You may also submit an intake form using our online system at ccrs.calcivilrights.ca.gov.

The completion and submission of this Intake Form will initiate an intake interview with a Civil Rights Department (CRD) representative. The CRD representative will determine if a formal complaint can be accepted for investigation. Your submission of this document acknowledges that you have read and agree to the CRD's Privacy Policy.

COMPLAINANT (YOUR INFORMATION)

Name: Susan Lyman

Phone: (650) 872-8510 Email: sklyman@duck.com

Address: 635 Pine Ter South

City: San Francisco State: CA Zip: 94080

Do you need an interpreter during the complaint process? ○ Yes ◉ No

If yes, indicate language: _____

Do you require disability-related accommodations when interacting with CRD? ○ Yes ○ No

Select all that apply:
- ☐ ASL/Video Remote Interpreting
- ☐ Video Interview
- ☐ CART Services
- ☐ Questions in advance
- ☐ Other (specify): _____

RESPONDENT (PERSON/BUSINESS YOU'RE FILING AGAINST)

Name: Initial Therapeutics, Inc. Phone: (415) 986-5900

Title: Represented by Sara Moore Email: smoore@grsm.com

Address: 315 Pacific Avenue

City: San Francisco State: CA Zip: 94111

Number of Employees: 24 Type of Employer: Private

CO-RESPONDENT (OPTIONAL)

Name: _____ Phone: _____

Title: _____ Email: _____

Address: _____

City: _____ State: _____ Zip: _____

Number of Employees: _____ Type of Employer: _____

■ ALLEGATION

First Date of Harm: 08/14/2023 Last Date of Harm: 03/29/2024

I allege that I experienced: ☒ Discrimination ☐ Harassment

BECAUSE OF MY ACTUAL OR PERCEIVED:

- ☐ Age (40 and over)
- ☐ Ancestry
- ☐ Association with a member of a protected class
- ☐ Bereavement Leave
- ☐ Cannabis Use
- ☐ Color
- ☐ Disability (physical, intellectual/developmental, mental health/psychiatric)
- ☐ Family Care and Medical Leave (CFRA) related to serious health condition of employee or family member, child bonding, or military exigencies
- ☐ Gender Identity or Expression
- ☐ Genetic Information or Characteristic
- ☐ Marital Status
- ☐ Medical Condition (cancer or genetic characteristic)
- ☐ Military and Veteran Status
- ☐ National Origin (includes language restrictions)
- ☐ Pregnancy, childbirth, breastfeeding, or related medical conditions
- ☐ Pregnancy Disability Leave (PDL)
- ☐ Race (includes hairstyle and hair texture)
- ☐ Religious creed (includes dress and grooming practices)
- ☐ Reproductive Health Decisionmaking
- ☐ Reproductive Loss Leave
- ☒ Sex/Gender
- ☐ Sexual harassment – hostile environment
- ☐ Sexual harassment – quid pro quo
- ☐ Sexual Orientation
- ☐ Other (specify): _____

AS A RESULT, I WAS:

- ☐ Asked impermissible non-job-related questions
- ☒ Demoted
- ☐ Denied accommodation for a disability
- ☐ Denied accommodation for pregnancy
- ☐ Denied accommodation for religious beliefs
- ☐ Denied any employment benefit or privilege
- ☐ Denied Bereavement Leave
- ☐ Denied employer paid health care while on Family Care and Medical Leave (CFRA)
- ☐ Denied employer paid health care while on Pregnancy Disability Leave (PDL)
- ☐ Denied equal pay (includes violations of the Equal Pay Act)
- ☐ Denied Family Care and Medical Leave (CFRA) related to serious health condition of employee or family member, child bonding, or military exigencies
- ☒ Denied hire or promotion
- ☐ Denied or forced to transfer
- ☐ Denied Pregnancy Disability Leave (PDL)
- ☐ Denied Reproductive Loss Leave
- ☐ Denied the right to wear pants
- ☐ Denied work opportunities or assignments
- ☐ Forced to quit
- ☐ Laid off
- ☐ Reprimanded
- ☐ Suspended
- ☒ Terminated
- ☐ Other (specify): _____

I allege that I experienced: ☒ Retaliation

BECAUSE I:

- ☐ Participated as a witness in a discrimination or harassment complaint
- ☒ Reported or resisted any form of discrimination or harassment
- ☐ Reported patient abuse (hospital employees only)
- ☐ Requested or used Bereavement Leave
- ☐ Requested or used a disability-related accommodation
- ☐ Requested or used a pregnancy-related accommodation
- ☐ Requested or used Pregnancy Disability Leave (PDL)
- ☐ Requested or used Reproductive Loss Leave
- ☐ Requested or used a religious accommodation
- ☐ Requested or used Family Care and Medical Leave (CFRA) related to serious health condition of employee or family member, child bonding, or military exigencies

AS A RESULT, I WAS:

- ☐ Asked impermissible non-job-related questions
- ☒ Demoted
- ☐ Denied accommodation for a disability
- ☐ Denied accommodation for pregnancy
- ☐ Denied accommodation for religious beliefs
- ☐ Denied any employment benefit or privilege
- ☐ Denied Bereavement Leave
- ☐ Denied employer paid health care while on Family Care and Medical Leave (CFRA)
- ☐ Denied employer paid health care while on Pregnancy Disability Leave (PDL)
- ☐ Denied equal pay (includes violations of the Equal Pay Act)
- ☐ Denied Family Care and Medical Leave (CFRA) related to serious health condition of employee or family member, child bonding, or military exigencies
- ☒ Denied hire or promotion
- ☐ Denied or forced to transfer
- ☐ Denied Pregnancy Disability Leave (PDL)
- ☐ Denied Reproductive Loss Leave
- ☐ Denied the right to wear pants
- ☐ Denied work opportunities or assignments
- ☐ Forced to quit
- ☐ Laid off
- ☐ Reprimanded
- ☐ Suspended
- ☒ Terminated
- ☐ Other (specify): _____

COMPLAINANT'S REPRESENTATIVE

Do you have an attorney who agreed to represent you in this matter? (●) Yes ( ) No

If yes, please provide the attorney's contact information:

Name: Marilyn Gabriela Robb

Firm Name: Katz Banks Kumin LLP

Phone: (202) 299-1140 Email: robb@katzbanks.com

Address: 11 Dupont Circle NW

City: Washington State: DC Zip: 20036

ADDITIONAL INFORMATION (OPTIONAL)

Briefly describe what happened:

See attached declaration.

DEMOGRAPHIC INFORMATION

This information is optional and is only used for statistical purposes.

Primary Language: _____ DOB: _____

Gender/Gender Identity: ☐ Male ☐ Female ☐ Non-Binary ☐ Other
☐ Transgender Male ☐ Transgender Female ☐ Intersex

Marital Status: ☐ Single ☐ Married ☐ Cohabitation ☐ Divorced

Race:
☐ American Indian, Native American or Alaskan Native
☐ Native Hawaiian or Other Pacific Islander
☐ Black or African American
☐ Asian
☐ White
☐ Other

Ethnicity: ☐ Hispanic or Latino ☐ Non-Hispanic or Latino

National Origin:

☐ Afghan
☐ American [U.S.A]
☐ Asian Indian
☐ Bangladeshi
☐ Cambodian
☐ Canadian
☐ Chinese
☐ Cuban
☐ Dominican
☐ Egyptian
☐ English
☐ Ethiopian
☐ Fijian
☐ Filipino
☐ German
☐ Ghanaian
☐ Guamanian
☐ Haitian
☐ Hawaiian
☐ Hmong
☐ Indonesian
☐ Iranian
☐ Iraqi
☐ Irish
☐ Israeli
☐ Italian
☐ Jamaican
☐ Japanese
☐ Korean
☐ Laotian
☐ Lebanese
☐ Malaysian
☐ Mexican
☐ Nigerian
☐ Other
☐ Other African
☐ Other Asian
☐ Other Caribbean
☐ Other European
☐ Other Hispanic/Latino
☐ Other Middle Eastern
☐ Pakistani
☐ Puerto Rican
☐ Salvadoran
☐ Samoan
☐ Sri Lankan
☐ Syrian
☐ Taiwanese
☐ Thai
☐ Tongan
☐ Trinidadian and Tobagonian
☐ Vietnamese

Disability:

- ☐ AIDS or HIV
- ☐ Blood / Circulation
- ☐ Brain / Nerves / Muscles
- ☐ Digestive / Urinary / Reproduction
- ☐ Hearing
- ☐ Heart
- ☐ Intellectual / Developmental
- ☐ Limbs [Arms / Legs]
- ☐ Mental Health / Psychiatric
- ☐ Sight
- ☐ Speech / Respiration
- ☐ Spinal / Back / Respiration
- ☐ Other Disability

Religion:

- ☐ Agnostic
- ☐ Atheist
- ☐ Bahai
- ☐ Buddhism
- ☐ Catholicism
- ☐ Christianity
- ☐ Confucianism
- ☐ Hinduism
- ☐ Islam
- ☐ Jehovah's Witness
- ☐ Judaism
- ☐ Neo-Paganism
- ☐ Nonreligious
- ☐ Protestantism
- ☐ Primal-indigenous
- ☐ Quakers
- ☐ Rastafarianism
- ☐ Spiritism
- ☐ Shinto
- ☐ Sikhism
- ☐ Taoism
- ☐ Unitarian-Universalism
- ☐ Zoroastrianism
- ☐ Other

Sexual Orientation:

- ☐ Straight or Heterosexual
- ☐ Gay or Lesbian
- ☐ Bisexual
- ☐ Other

PRIVACY POLICY

The California Civil Rights Department (CRD) values the security and privacy of your personal information and is committed to protecting your privacy rights. CRD seeks only to collect relevant personal information to assist you in investigating and resolving complaints of discrimination as prescribed by the California Fair Employment and Housing Act, California Government Code section 11135 et seq. (discrimination in programs or activities funded by the state);, California Government Code section 12900 et seq.; the Unruh Civil Rights Act, California Civil Code section 51; the Ralph Civil Rights Act of 1976, the Equal Pay Act, California Civil Code section 51.7; California Civil Code section 52.5 (civil action for damages for victims of human trafficking); and California Civil Code section 54 et seq. (right to streets, highways, and other public places for blind and other physically disabled persons).

All personal information collected is governed by the Information Practices Act of 1977, California Civil Code sections 1798-1798.78); California Government Code section 11015.5 (electronically collected personal information); California Government Code section 11019.9 (posting of permanent privacy policy); and the California Public Records Act, California Government Code section 7920.000 et seq.

Outlined below is our online Privacy Policy and Notice:

- Legal Authority for Collection, Maintenance, and Use of Personal Information
- Disclosure and Sharing of Personal Information
- Purposes for Use of Personal Information
- Third-party website links on CRD website
- Storage of "Cookies" on CRD Website Users' Computers
- Right of Access to CRD's Records Containing Personal Information
- Protecting the Privacy of Minors
- Security of Personal Information
- Access and Corrections to Your Personal Information
- Changes to Privacy Policy
- Effective Date of Privacy Policy

LEGAL AUTHORITY FOR COLLECTION, MAINTENANCE, AND USE OF PERSONAL INFORMATION

CRD collects information that may be directly associated with a specific person. This information is called "Personal Information," and it includes but is not limited to names, addresses, telephone numbers, and email addresses. CRD collects this Personal Information through lawful means from individuals who seek to file a complaint with the CRD, and the information is used to carry out CRD's official responsibilities: establishing jurisdiction and furthering CRD's efforts to investigate and attempt to resolve allegations of unlawful discrimination, harassment, and/or retaliation. If you are requesting CRD to investigate and resolve your filed discrimination complaint, you are required to provide CRD with sufficient information in accordance with California Government Code sections 11135 et seq. and 12900 et seq., and California Civil Code sections 51, 51.7, 52.5, and 54 et seq.

With respect to each item of information CRD seeks to collect from you, CRD will indicate whether submission of the information is mandatory or optional. If you do not provide the information requested, CRD may be unable to investigate or appropriately process your complaint and may have to close your complaint.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

CRD will not disclose, make available, or otherwise use your personal information for purposes other than those specified without your consent, unless required by law. CRD will not distribute or sell any of your electronically or non-electronically collected Personal Information to any third party without your consent, unless required by law.

CRD may share your Personal Information under the following circumstances:

1. You give CRD permission.
2. CRD receives a request from a party with legal authority to obtain the information, such as is the case with a subpoena.
3. As authorized by law, the information is transferred to/shared with the U.S. Equal Employment Opportunity Commission, National Labor Relations Board, U.S. Department of Labor, U.S. Department of Housing and Urban Development, U.S. Department of Health and Human Services, U.S. Department of Education, U.S. Department of Justice, any branch of the California State Government, or any other local or Federal agency with similar jurisdiction.

Note: Non-Personal Information, including allegations in the complaint document, may be disclosed to the public pursuant to a request under the California Public Records Act.

PURPOSES FOR USE OF PERSONAL INFORMATION

The Personal Information collected from you will be used for the purposes for which you are providing it: establishing jurisdiction and furthering CRD's efforts to investigate and attempt to resolve allegations of unlawful discrimination, harassment, and/or retaliation. Electronically collected Personal Information gathered about your visits to the CRD website is used to improve the user experience and for basic web metrics.

THIRD-PARTY WEBSITE LINKS ON CRD'S WEBSITE

The CRD website may contain links to other websites on the Internet that are owned and operated by third parties. CRD does not control the privacy policies or practices of these websites. You are advised to review the privacy policies of the third party offering the website before providing any Personal Information to these websites. CRD is not responsible for the content or practices of any linked third-party websites and such third-party websites are provided solely as a convenience.

STORAGE OF "COOKIES" ON CRD WEBSITE USERS' COMPUTERS

When you visit the CRD website, CRD will send a small piece of information called a "cookie" to your computer that helps CRD recognize your unique computer and your preferences when using the website. Cookies generally contain information about the type of browser you used, the date and time you visited the site, and the web pages you visited. Cookies do NOT include Personal Information, such as names, addresses, telephone numbers, and email addresses, and are only active when you log in to our site. This information collected on cookies is used to improve the user experience and for basic web metrics. Also, each time you visit the CRD website, information about your visit is captured in a web server log file. The information collected in the web server log file is discarded after each site visit and is used only for general reporting metrics and auditing purposes. This type of electronic information collection is permitted by law and is exempt from disclosure under the California Public Records Act.

The cookies will remain on your computer unless you delete them. You can manage your cookies by accessing your browser's preferences menu, which will allow you to delete them or prevent them from being placed on your computer. You should be aware, however, that some websites may not work properly if you block the placement of cookies on your computer.

Please find below links to instructions for managing cookies for specified browsers.

- Microsoft Edge browsers
- Macintosh Safari browsers
- Google Chrome browsers

RIGHT OF ACCESS TO CRD'S RECORDS CONTAINING PERSONAL INFORMATION

In the State of California, laws exist to ensure that the government is open to the public and that the public is able to access records and information possessed by the government. At the same time, there are exemptions from mandatory disclosures in federal and state law.

These exemptions serve various purposes including protecting the privacy of individuals. All information collected by CRD becomes a public record that may be subject to inspection and copying by the public unless an exemption in law exists. In the event of a conflict between this Privacy Policy and the California Public Records Act, the Information Practices Act of 1977 and/or other law governing the disclosure of records, the California Public Records Act, the Information Practices Act of 1977, and/or other applicable law will control.

PROTECTING THE PRIVACY OF MINORS

CRD recognizes the importance of protecting privacy where minors (a person under 18 years of age are involved. CRD is committed to protecting the privacy of minors and does not knowingly collect Personal Information from minors or create profiles of minors through the CRD website. Website users are cautioned, however, that the collection of Personal Information submitted online or in an email will be treated as though it was submitted by an adult. CRD strongly encourages parents, guardians, and adults to be involved in the internet activities of their children or other minors they are responsible for and to provide guidance whenever minors are asked to provide Personal Information online. If you believe a minor has provided us with Personal Information related to a complaint, we ask that a parent, guardian, or other responsible adult contact us at 1-800-884-1684.

SECURITY OF PERSONAL INFORMATION

CRD has put security measures in place to safeguard Personal Information maintained in our electronic and paper files and to protect it against loss or unauthorized access, use, modification, or disclosure. Access to Personal Information is limited to employees who have an established business need for the Personal Information including those directly involved in the filing, investigation, resolution, and/or litigation of your complaint.

CRD's security measures include various security technologies such as encryption software used to protect the security of Personal Information during transmission and storage. Personal information is destroyed according to the CRD's records retention policy, and CRD only retains these records for as long as necessary to fulfill CRD's business needs. CRD trains its employees on the procedures and management of Personal Information that is collected, precautions to be taken to prevent unauthorized access, use, modification, or disclosure, and compliance with limitations on the release of Personal Information.

ACCESS AND CORRECTIONS TO YOUR PERSONAL INFORMATION

You have the right to inspect the Personal Information collected about you. Upon request, CRD will provide you with the Personal Information CRD collected in order to carry out its official responsibilities. You may correct errors in your Personal Information by submitting a written request that credibly shows the error and the accurate and complete facts. If you believe that your Personal Information is being used for a purpose other than what you intended when you submitted it, you may contact CRD to rectify the misuse. CRD will take reasonable steps to verify your identity before granting access or making corrections.

CRD PRIVACY OFFICER CONTACT INFORMATION

If you have any questions or concerns about the information presented in this Privacy Policy, or if you would like to inspect records containing your Personal Information or request corrections to it, you may contact:

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651 Bannon Street, Suite 200,
Sacramento, CA 95811
contact.center@calcivilrights.ca.gov
1-800-884-1684

CHANGES TO PRIVACY POLICY

CRD may update and revise this Privacy Policy. CRD will prominently post any revision or update on the CRD website.

EFFECTIVE DATE OF PRIVACY POLICY

Effective Date: January 1, 2017

Revision Date: July 1, 2024

DECLARATION OF SUSAN LYMAN

I, Susan Lyman, submit this signed and sworn declaration in support of my claims for unlawful discrimination and retaliation against Initial Therapeutics, Inc. ("Initial Therapeutics" or the "Company") in violation of the California Fair Employment and Housing Act, Cal. Gov. Code § 12900 *et seq.*, Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, and the California Labor Code, Ca. Labor Code § 1102.5(b).

As detailed below, Initial Therapeutics retaliated against me after I raised concerns about the Company's differential treatment of male and female scientists. Initial Therapeutics consistently hired female scientists, including me, into positions with job titles lower than their experience and qualifications warranted. The Company placed female employees in less senior roles than their equally- or less-experienced male peers, then failed to promote them as quickly as the Company promoted male scientists. I raised these concerns to senior leaders, who reacted with hostility and retaliation, and ultimately terminated my employment on March 29, 2024. As a result of this discrimination and retaliation, I have suffered and will continue to suffer economic loss, reputational harm, and significant emotional distress.

On January 14, 2025, Initial Therapeutics and I, through counsel, entered into a Tolling Agreement whereby any running statute of limitations or filing deadline that had not yet lapsed associated with my claims against the Company relating to sex discrimination and retaliation in violation of California's Fair Employment and Housing Act, Cal. Gov't Code § 12940 *et seq.*; Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, and California's Whistleblower Protection Act, Cal. Lab. Code § 1102.5(b), would be tolled, would not lapse, and would continue to exist in full until the termination of that Agreement. The Tolling Agreement further stated that the period of time between January 14, 2025 and the termination of the Agreement shall be excluded in calculating any statute of limitations, filing deadlines, or damages periods to an action commenced after the termination of this Agreement. The Tolling Agreement terminated on June 11, 2025. Therefore, this submission is timely.

The facts in support of my charge of discrimination and retaliation are as follows:

1. I am an accomplished and highly credentialed biotechnology scientist. I received a PhD. in Molecular & Cell Biology from the University of California, Berkeley, where my studies were supported by a National Science Foundation ("NSF") predoctoral fellowship. I similarly received national recognition in my postdoctoral studies, with a Damon Runyon Cancer Research Foundation fellowship – which, like the NSF fellowship, is a highly competitive and prestigious award. I completed postdoctoral work at Scripps Research and Harvard Medical School, before accepting a job as Scientist II at the oncology-focused biotech company, Exelixis. Thereafter, I accepted a position as Scientist II with Gilead Sciences, and within three years, was promoted to Senior Scientist I. After four and a half years at Gilead, I accepted a position as Senior Scientist II with CytomX Therapeutics, where I quickly rose up the ranks to Associate Director, then Director of Translational Medicine.

2. After five and a half years at CytomX, I applied to work at Initial Therapeutics in response to a job posting for Director, Tumor Biology & Biomarker Research. When I joined ITx as the Director, Tumor Biology-Biomarker Research on August 14, 2023, I had over twenty-two years of relevant post-PhD experience and had published 17 papers. I reported to the Senior Vice President of Biology, Dr. Peiwen Yu.

3. I was successful at Initial Therapeutics right away, both as a scientist and as a manager. In my 2023 year-end performance review, Dr. Yu rated my performance as "[f]ully meets expectations." The review praised me for being "detail-oriented," "enthusiastic," and "providing valuable technical advice" to her teams. According to the review, I "exhibit[] strength in [my] evident passion for science, attention to technical detail, and desire to support scientists in her reporting line."

4. Soon after joining the Company, I discovered significant title inequity between male and female scientists.

5. The Company maintains a career ladder that details the typical education and experience required for each role. According to this career ladder, employees with PhDs were

eligible for positions as Scientist I, Scientist II, Senior Scientist I, Senior Scientist II, Principal, or Fellow, depending on the number of years of their post-PhD experience. As relevant here, the ladder guidelines stated that a Scientist I was to have a PhD and 0-2 years of industry experience, while for a Scientist II the stated criterion was a PhD and 2-5 years of relevant post-PhD (inclusive of postdoc) experience. Given that an average period of postdoctoral study is at least two years, this strongly implies that a scientist who had undertaken postdoctoral study would typically be hired as Scientist II, not Scientist I, even if that individual had no prior biotech experience.

6. My direct reports, Ilsa Kirby and Esraa Mohamed (both women), worked at the Company since April 2021 and April 2022, respectively. Both women had a PhD as well as postdoctoral study experience. At the time of her hiring, Dr. Kirby had 2.2 years of extremely relevant postdoctoral experience, which would place her at the Scientist II level according to the career ladder. However, the Company hired her as a Scientist I, one step below the position for which she was qualified. Likewise, according to the career ladder, Initial Therapeutics should have hired Dr. Mohamed as a Scientist II because she had 2.8 years of relevant postdoctoral experience at the time of her hiring. But like Dr. Kirby, Dr. Mohamed was hired as a Scientist I. Even though both women had over two years of postdoctoral experience, the Company hired them both into the position reserved for scientists with less than 2 years of post-PhD experience. Another female PhD scientist, April Chen, joined the Company in the summer of 2023, when she had 4 years of postdoctoral experience. Therefore, under the ladder guidelines, Initial Therapeutics should have hired Dr. Chen as Scientist II. The Company hired her as a Scientist I.

7. Meanwhile, the Company did not appear to under-hire male scientists. For example, Initial Therapeutics hired another junior employee, Fred Ward, in March 2021, one month before he completed his PhD, and therefore with no postdoctoral or industry experience.

He was hired as a Scientist I as well, which, according to the career ladder, requires a PhD and 0-2 years of industry experience.

8. The below table summarizes my observations that Initial Therapeutics hired female PhDs into positions below the title for which they were qualified by dint of their experience.

Table 1: Under-hiring of Female Employees

Employee	Years of post-PhD. experience at hiring	Position commensurate with experience under Company guidelines	Position offered by Initial Therapeutics	Gender	Under-hired?
April Chen	4	Scientist II	Scientist I	Female	Yes
Ilsa Kirby	2.2	Scientist II	Scientist I	Female	Yes
Esraa Mohamed	2.8	Scientist II	Scientist I	Female	Yes
Fred Ward	0	Scientist I	Scientist I	Male	No

9. My female direct reports, Drs. Kirby and Mohamed, separately and independently raised concerns to me that they had been under-titled upon hiring, and both asked me advocate for them to be promoted to Scientist II – the position commensurate with their qualifications and experience. I agreed because I shared their concerns.

10. I raised concerns about inequities between male and female scientists on multiple occasions, both with my direct manager Dr. Yu and later also with the Chief Scientific Officer Dr. Phil Patten.

11. For example, on October 27, 2023, I told Dr. Yu that I had substantial concerns about the visibility of and development opportunities for her all-female staff. I raised concerns that my two female direct reports, Drs. Kirby and Mohamed, were not invited to present their own data at externally-facing meetings, and instead, a male scientist, who had not done the work,

was less knowledgeable about the work, and had less overall research experience, was presenting the work of his two more experienced female colleagues.

12. Around the same time, I observed that Dr. Patten often displayed a preference for male scientists. For example, he sometimes asked male scientists, but not female scientists for their scientific opinions, even when the subject matter was a core area of expertise of a female scientist, but not a male scientist. He also frequently communicated directly with Dr. Ward while excluding female scientists, even when the subject of the communication was relevant to their (the female scientists') work.

13. In November 2023, the Company created a new position, Executive Director, Translational and Clinical Pharmacology, and hired Dr. Jeff Hsu to fill it. Dr. Hsu was hired as an "Executive Director," two steps above my Director title. Dr. Hsu had just under 26 years of post-PhD experience at the time of his hiring (three more years than me), but no experience in clinical pharmacology, which was a substantial component of his job.

14. In late 2023, I shared with Dr. Yu my concerns that my direct reports, Dr. Kirby and Dr. Mohamed were "under-titled." I explained that, based on their years of experience and the strength of their experiences, the Company should have hired them as "Scientist II." However, the Company hired them as "Scientist I." I expressed concern that Drs. Kirby and Mohamed—both of whom had over two years of postdoctoral experience, were hired into the same position as Dr. Ward—who had not even completed his doctoral degree at the time of his hiring and had no postdoctoral experience.

15. During another one-on-one meeting with Dr. Yu on January 3, 2024, I suggested to Dr. Yu that the Company make a one-time "retro-correction" to bring Drs. Kirby and Mohamed's titles in line with the career ladder. I explained that this correction was important because Dr. Kirby, Dr. Mohamed, and Dr. Ward were all hired into the same position despite the women having significantly more experience. I further suggested that Initial Therapeutics financially compensate Drs. Kirby and Mohamed for their years in a lower title, and making a

lower salary, than their experience warranted. Dr. Yu cut the conversation short, and clearly did not support any "retro-correction" for Drs. Kirby and Mohamed.

16. On or around January 24, 2024, I again raised concerns to Dr. Yu that a male scientist, Dr. Ward, was given more opportunities than Drs. Kirby and Mohamed, for example, by presenting data generated by Drs. Kirby and Mohamed at the external-facing Scientific Advisory Board meeting. I told Dr. Yu that Drs. Kirby and Mohamed should be presenting this data themselves, as the presentation was about their work, not Dr. Ward's, and both Drs. Kirby and Mohamed had more research experience than Dr. Ward. In response to my suggestion, Dr. Yu stated that it was not her decision who presented at the advisory board meeting.

17. At my request, I met with Dr. Patten on January 26, 2024 to discuss and give feedback on Company culture. Among other concerns, I explained that my two female direct reports were given fewer development opportunities and less visibility than their counterpart Dr. Ward. When the time Dr. Patten allotted for the meeting ended, I was not yet finished with my prepared topics and requested the opportunity to continue our conversation. Dr. Patten said yes, immediately followed by, "Time for more bitching."

18. When I and Dr. Patten met again on January 31, 2024, I told him that I was offended when he characterized my previous feedback as "bitching." Dr. Patten stated something to the effect of, "I didn't mean to imply that you were a bitch." Until that moment, I had not considered the possibility that Dr. Patten thought of me as a "bitch." Indeed, I was stunned by the implication that a woman complaining about gender disparities could be considered a "bitch."

19. At a loss for how to respond to that comment, I proceeded with my prepared topics. I shared with Dr. Patten my belief that I was under-titled upon my hiring, since I had at that point 23 years of post-PhD experience, and the job posting for my position had required only ten years of industry experience or an "equivalent combination of education and experience." I referenced the recent Senior/Executive Director job ad, which made clear that the Company believed that candidates with over 20 years of experience were qualified for Senior or Executive Director roles. I explained that Dr. Hsu had only three years of experience more than I had, but

was hired as an Executive Director, a position two full steps above my own. I explained that Dr. Hsu's experience, combined with the job posting, indicated that I was qualified, at minimum, for a Senior Director role. Dr. Patten showed no willingness to take any concrete measures to address my concerns.

20. In February 2024, the Company posted an ad for a new Senior or Executive Director role. According to the posting, Initial Therapeutics sought candidates with over 20 years of post-PhD experience. Notably, I had 23 years of relevant post-PhD experience at the time. The Company did not invite me to apply for the position, even though I was qualified. Instead, I learned that I was to report to his new position, and of Dr. Yu's current reports, I (alone) was to switch and report to this new senior employee.

21. On February 21, the Company interviewed Dr. Sean Bell for the newly created Senior or Executive Director role. Dr. Bell had less than 18 years of post-PhD experience, much of which was in an area of science that was not particularly relevant to the role as advertised. The Company asked me to submit an evaluation of Dr. Bell's candidacy. In the evaluation, I wrote that I was a better fit to be a Senior Director than Dr. Bell. Later, during a one-on-one meeting with Dr. Yu, I shared my surprise that Initial Therapeutics was even considering this man's application, given his lack of qualifications.

22. I received a final year-end rating in my performance review on February 26, 2024, and my overall performance rating was "fully meets expectations." Thus even while Initial Therapeutics changed my reporting structure and denied me promotional opportunities, the Company did not dispute my strong performance.

23. On February 29, 2024, Dr. Yu sent a company-wide email announcing the promotion of Dr. Kirby to Scientist II and of Dr. Ward to Senior Scientist I. I was thrilled that my advocacy on Dr. Kirby's behalf, and the package I prepared in support of Dr. Kirby's promotion, was successful, and that, after three full years with the Company, Dr. Kirby was finally promoted to the title she should have been hired at – but by that time, she had 5.2 years of post-PhD

experience, well above the minimum two-year guideline for a new Scientist II, and actually within the guideline for the more senior position, Senior Scientist I.

24. I remained concerned that the Company was not promoting its female scientists as quickly as its male scientists, such as Dr. Ward, who received two promotions in the same time it took the Company to promote Dr. Kirby once (to the title at which she should have been hired). The Company hired Dr. Ward as a Scientist I with zero industry experience in March 2021, and promoted him to Scientist II in March 2023, at which time he had under two years of post-PhD experience. The Company promoted Dr. Mohamed to Scientist II in August 2023. At that time, Dr. Mohamed had over four years of post-PhD experience, compared to Dr. Ward's two years and four months. The Company did not promote Dr. Kirby and Dr. Mohamed to Scientist II positions until they were qualified (or nearly so) for Senior Scientist I, the position one step above Scientist II. And though Dr. Chen is qualified for the Senior Scientist I position per the Company's written guidelines, at the time of this writing, to the best of my knowledge the Company has still not promoted her from Scientist I, a title two steps below the position for which she is qualified.

25. The below table summarizes my observations that Initial Therapeutics delayed promotions of female PhD scientists, but not of male PhD scientists.

Table 2: Delayed Promotions of Female Employees

Employee	Years of post-PhD experience as of May 2025	Years of post-PhD experience when promoted to Scientist II (Guidelines: 2+ years)	Years of post-PhD experience when promoted to Senior Scientist I (Guidelines: 5+ years	Gender	Promotion delayed?
April Chen	6.2	*Never promoted to Scientist II*	*Never promoted to Senior Scientist I*	Female	Yes
Ilsa Kirby	6.2	5	*Never promoted to Senior Scientist I*	Female	Yes
Esraa Mohamed	5.7	4	*Never promoted to Senior Scientist I*	Female	Yes

Fred Ward	4.1	1.9	2.9	Male	No (promotion accelerated)

26. As demonstrated below in Table 3, Initial Therapeutics' under-hiring of female employees, combined with its delayed promotions of female employees, results in a work environment in which women PhD holders are in positions far below what is warranted by their education and experience.[1]

Table 3: Undervaluation of Female Employees

Employee	Position as of May 2025	Position for which employee was qualified, based on post-PhD experience guidelines	Gender	Position relative to qualifications
April Chen	Scientist I	Senior Scientist I	Female	Two steps below
Ilsa Kirby	Scientist II	Senior Scientist I	Female	One step below
Esraa Mohamed	Scientist II	Senior Scientist I	Female	One step below
Fred Ward	Senior Scientist I	Scientist II	Male	One step above

27. My colleagues shared my concerns that the Company promoted men more quickly than it promoted women. I had frequent conversations with Drs. Kirby and Mohamed about their under-titling and delayed promotions compared to their male counterparts, and I

[1] Unfortunately, this fits an all-too familiar pattern of the treatment of women PhDs in science, technology, engineering and math ("STEM") fields. It is well-established that women face barriers to promotion across industries. A 2022 report from McKinsey found that only 86 women are promoted to manager for every 100 men across every industry. *See Women in the Workplace 2024: The 10th-Anniversary Report*, Alexis Krivkovich et al., MCKINSEY & COMPANY (Sept. 17, 2024), available at https://www.mckinsey.com/featured-insights/diversity-and-inclusion/women-in-the-workplace#/. This sex discrimination is even more rampant in STEM industries than in other fields. *See Women Fighting Stereotypes and Systemic Discrimination in STEM*, NAT. GEO., available at https://education.nationalgeographic.org/resource/women-fighting-stereotypes-and-systemic-discrimination-stem/. According to a study by the Pew Research Center, discrimination on the basis of sex commonly impedes career success in STEM jobs, and "women in STEM who hold postgraduate degrees" are particularly susceptible to sex discrimination at work. *See Women and Men in STEM Often at Odds Over Workplace Equity*, Cary Funk and Kim Parker, PEW RESEARCH CENTER (Jan. 9, 2018), available at https://www.pewresearch.org/social-trends/2018/01/09/women-and-men-in-stem-often-at-odds-over-workplace-equity/. In fact, according to data from a nationally representative Pew Research Center survey with an oversample of people working in STEM jobs, 62% of all "women in STEM who hold postgraduate degrees" have experienced sex discrimination at work. *Id.*

advocated on their behalf on multiple occasions. Other employees submitted anonymous questions about promotion inequity to Dr. Patten. During Company-wide all-hands meetings, Dr. Patten read and answered questions that employees submitted anonymously to an online "Question/Suggestion Box." During an all-hands meeting in late February or early March 2024, employees submitted questions about the "fairness of the career ladder" and concerns about the "promotion demographics." Based on the demonstrably uneven demographics of the employees that the Company had hired into senior titles and/or promoted, I understood "demographics" as an obvious reference to gender. Rather than answering the questions, Dr. Patten stated that whoever submitted the anonymous questions should identify themselves to him and/or others in leadership and raise their question in private. It was unusual for Dr. Patten refuse to answer a question from the online "Question/Suggestion Box," and his instruction for the questioners to identify themselves and speak to him in private seemed intended to deter employees from discussing the Company's gendered treatment of its employees.

28. On March 11, 2024, the Company hired Eric Johnson to the newly created role of Executive Director, Discovery Sciences. Thereafter, I reported to Dr. Johnson instead of Dr. Yu. Like the recent hire Dr. Hsu (Executive Director of Translational and Clinical Pharmacology), Dr. Johnson had around 26 years of post-PhD experience—three years more than me, and he was in a role two full title steps above mine.

29. When I joined Initial Therapeutics as a Director in August 2023, the Company had no other Directors, and no Associate Directors, Senior Directors, or Executive Directors. Between November 2023 and March 2024, the Company interviewed for Senior/Executive Directors, and hired two new Executive Directors. Therefore, in March 2024, I for the first time had multiple counterparts at or above the Director level.

30. As reflected in the below table, I observed that the Company seemed to apply a different standard to senior male scientists than it applied to me. For example, Drs. Hsu and Johnson had less than three years of additional experience compared to me in March 2024, but were hired into roles a full two steps above my Director role. And while the Senior/Executive

Director candidate Dr. Bell had five years less experience than me, and two years less experience than the minimum required by the job posting, the Company considered him for a role that was senior to mine. The Company did not invite me to apply for the role that Dr. Bell (and Dr. Johnson) interviewed for, even though much of my experience was directly related to this new role, and a significant part of Dr. Bell's experience was not.

Table 4: Discriminatory Standards for Director-Level Hires

Employee	Years of Post-PhD Experience as of March 2024	Position	Gender	Position relative to me
Me (Susan Lyman)	23.2	Director	Female	---
Jeff Hsu	26.1	Executive Director	Male	Two steps above
Eric Johnson	26.2	Executive Director	Male	Two steps above
Sean Bell	17.8	Senior Director[2]	Male	One step above

31. On March 19, 2024, the Company reassigned my team of six to a different manager and demoted me to a "Senior Principal Scientist." The Company claimed it was a "restructuring," but no other team was restructured, and the only change was to take away my direct reports and assign them to a different manger. I was also told that I would no longer retain the Director title, but that my title would be altered to "Senior Principal Scientist" – a change that would be viewed by most biotech scientists as a demotion.

32. I met with Dr. Patten later that day to object to the removal of my team. I explained that there was no logical basis for only my team to be restructured in this way. Neither of Dr. Yu's other two direct reports (Dr. Ward and Dr. Hsu – both male) had their teams removed or their manager reassigned. Dr. Patten responded that the change was necessary because he

[2] Though Dr. Patten supported Dr. Bell's candidacy, he was not ultimately hired.

heard that I had said "negative" things about the leadership team, and the Company could not tolerate that.

33. The next day, one of my colleagues informed me that late in the afternoon on March 21, she had overhead a conversation between Dr. Johnson and Dr. Patten in which Dr. Patten explained that the Company feared potential litigation from female employees and needed to "shut it down." My colleague told me that she understood this to mean that they needed to scare other women out of speaking up, and they would do so by terminating my employment and making an example of me.

34. On March 22, 2024, I met with Dr. Johnson, Dr. Patten, and a Human Resources representative to discuss the new team structure and my new position. Dr. Patten opened the meeting by offering me the opportunity to resign. He then said that if I decided to stay at Initial Therapeutics, then the Company would not tolerate any "negative" talk about leadership.

35. I responded by explaining why I believed that the team removal and title change represented a retaliatory demotion. I explained that the supposed "restructuring" did not seem to be a logical policy decision about restructuring the Company's reporting lines, but appeared targeted specifically at me and my role. I stated that the restructuring and demotion felt like retaliation for the fact that I had been vocal about raising issues within the Company.

36. On March 29, 2024, the Company terminated my employment.

37. The Company's unlawful termination of my employment has upended my life and career. Before losing my job, I was a nationally recognized scientist and researcher. Now, I must navigate a job search in a biotechnology sector plagued by economic uncertainty, layoffs, funding shortages, regulatory setbacks, and industry-wide cost-cutting measures.

38. There were over 24,000 biotech or pharma employees laid off in 2024, as the industry saw more layoffs, fewer open roles, and more job applicants in 2024 than in years

previously.[3] The market has yet to improve:[4] the first five months of 2025 saw 12,300 more biotech / pharma employee layoffs.[5]

39. Despite my best efforts, and submission of over a dozen job applications, I have been unable to find comparable employment since my termination. In what is widely seen as the worst and most persistent biotech downturn in over 20 years, in an extremely tight market saturated with laid-off job seekers, I am additionally handicapped by having to reveal to any prospective employer that I was terminated from my previous role. No matter how unjust, unmerited, and retaliatory I feel that termination was, this one fact has the potential to sandbag any traction I may get in a biotech job market that is already extremely challenging.

40. Additionally, Initial Therapeutics' discriminatory and retaliatory treatment has caused me serious emotional distress, including by causing me to suffer feelings of anxiety and depression, as well as insomnia, increased blood pressure, and exacerbation of pre-existing health conditions.

I SOLEMNLY SWEAR OR AFFIRM under the penalties of perjury that the matters set forth in this Declaration are true and correct to the best of my personal knowledge, information, and belief. Executed on this 13th day of June 2025.

Susan Lyman

[3] Gabriel, Angela, *2024 Q4 Job Market Report: Biopharma Job Postings Slowed as Layoffs Continued,* BIOSPACE (Feb 12 2025); available at https://www.biospace.com/job-trends/2024-q4-job-market-report-biopharma-job-postings-slowed-as-layoffs-continued; Gabriel, Angela, *2024 Q2 Job Market Report: More People Competing for Fewer Job Openings*, BIOSPACE (Jul. 11, 2024), available at https://www.biospace.com/job-trends/2024-q2-job-market-report-more-people-competing-for-fewer-job-openings.

[4] Adam, Jules, *The biotech job market in 2025: Still in survival mode?*, LABIOTECH. Available at https://www.labiotech.eu/trends-news/biotech-job-market-2025/.

[5] BioSpace Editorial Staff, *Layoff Tracker*, BIOSPACE (June 12 2025); available at https://www.biospace.com/biospace-layoff-tracker.

STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GAVIN NEWSOM, GOVERNOR

Civil Rights Department

KEVIN KISH, DIRECTOR

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October 3, 2025

Via Email: sklyman@duck.com

Susan Lyman
635 Pine Terrace
South San Francisco, CA 94080

RE: **Request to Approve Complaint**
Case Number: 202507-30348518
EEOC Number:
Case Name: Lyman / Initial Therapeutics, Inc.
Case Type: Employment

Dear Susan Lyman:

A draft complaint has been prepared for your review and signature. Please read the enclosed draft complaint carefully. If you agree with the language, please sign and return the complaint via email. If you do not approve of the language, do not sign it.

You may return the complaint to me via email at **la.krischa.franklin@calcivilrights.ca.gov**

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

If you are unable to return the signed complaint via email you may also return it via fax at 1-888-519-5917 or via postal mail by sending it to **Civil Rights Department, 651 Bannon Street, Suite 200 Sacramento, CA 95811.**

Please note that the information you provided is subject to CRD's privacy policy and the California Public Records Act, Government Code section 7920.000 et seq.

Thank you for your cooperation.

Sincerely,

La. Krischa Franklin

La.Krischa Franklin
Associate Governmental Program Analyst
559-337-5273
la.krischa.franklin@calcivilrights.ca.gov

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

CASE NUMBER

202507-30348518

EEOC NUMBER

COMPLAINANT	ADDRESS	PHONE
Susan Lyman	635 Pine Terrace South San Francisco, CA 94080	650 872-8510

TYPE OF DISCRIMINATION AND LAW

Government Code 12940

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)	ADDRESS	PHONE
Initial Therapeutics, Inc.	315 Pacific Avenue San Francisco, CA 94111	415 986-5900

NO. OF EMPLOYEES

20-49

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

CASE NUMBER

202507-30348518

EEOC NUMBER

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED
Discrimination
ON OR BEFORE
March 29, 2024
BECAUSE OF MY ACTUAL OR PERCEIVED
Sex/Gender
AS A RESULT, I WAS SUBJECTED TO
Terminated
PARTICULARS
From on or around August 14, 2023, through on or around March 29, 2024, I was subjected to discrimination based upon my sex/gender (female). As a result, I was demoted and terminated. During my tenure with Respondent on several occasions, I was praised for my exemplary performance. However, when I expressed my concerns on the disparate treatment that my female colleagues and I endured compared to my male colleagues, I began to be reprimanded. Specifically, on or around mid-August 2023, I was made aware from my subordinates that their title were lower than their male counterparts. On or around November-December 2023, I spoke to the SVP of Biology, Dr. Peiwen Yu, about how my two female subordinates had lower titles than their male counterparts. On or around January 31, 2024, I spoke with CSO, Phil Pattern to discuss a title change for myself. However, I was ignored. On or around March 19 and March 20, 2024, Respondent announced that the Company was making changes that included removing my authority over my team and changing lowering my title. My male counterpart with less experience than I, was not treated in the same manner. On or around March 29, 2024, I was called into a meeting with my reporting Supervisor, Eric Johnson, and HR Consultant, Jackie Rauh, informing me that my employment was being terminated.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED
Retaliation
ON OR BEFORE
March 29, 2024
BECAUSE OF MY ACTUAL OR PERCEIVED
Reported or resisted any form of discrimination or harassment
AS A RESULT, I WAS SUBJECTED TO
Terminated
PARTICULARS
On or about March 29, 2024, I was terminated in retaliation for reporting or resisting any form

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

CASE NUMBER

202507-30348518

EEOC NUMBER

of discrimination or harassment. On or around mid-August 2023 and December 2023 (respectively), I was made aware that my female subordinates and I were experiencing disparate treatment compared to my male colleagues and counterparts. On or around January 31, 2024, I had a meeting with CSO, Phil Patten regarding the disparate treatment and requested for my title to be reviewed and changed based on the company alignment. At that time, Dr. Patten stated he would look into it. Shortly after the meeting, I was informed by my colleague who overheard Dr. Patten and my reporting Supervisor, Eric Johnson, that they feared a lawsuit from myself and subordinates that they needed a plan to shut us down. On or around March 19 and March 20, 2024, I was called into meetings with Dr. Johnson and HR Consultant Jackie Rauh. During the meeting, Dr. Johnson informed me that the company was making some changes that included authority of my team being removed and my title change that was lower with no justification. The following week, on or around March 29, 2024, I was called into a meeting with Dr. Johnson and Ms. Rauh, I was informed that my employment was being terminated.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

Mohgee Rao

DATE:

Oct 3, 2025

2025.10.3.Lyman _ Complaint - eSign04

Final Audit Report 2025-10-03

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EXHIBIT

B

KATZ BANKS KUMIN

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By Electronic Mail
April 16, 2026

La Krischa Franklin
Associate Governmental Program Analyst
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Sacramento, CA 95811
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Re: Susan Lyman v. Initial Therapeutics, Inc. (CRD Case No. 202507-30348518)

Dear Ms. Franklin,

I write this letter on behalf of Complainant Dr. Susan Lyman, in response to Respondent Initial Therapeutics, Inc.'s ("Initial Therapeutics" or the "Company") Position Statement, which you relayed to Dr. Lyman and her counsel on March 17, 2026. Initial Therapeutics's Position Statement relies on inaccurate assertions, which are contravened by Dr. Lyman's contemporaneous records, and distorts the circumstances leading to its decision to terminate her employment with the Company. As detailed below, Dr. Lyman engaged in protected activity on numerous occasions when she raised concerns to her supervisors regarding discrimination by Initial Therapeutics against female scientists. In response, the Company demoted Dr. Lyman and then terminated her employment under pretextual circumstances. The accompanying exhibits, which include but are not limited to texts, emails, and Dr. Lyman's contemporaneous notes, corroborate Dr. Lyman's allegations. Given the weight of this evidence and the insufficiency of the Company's defenses, Dr. Lyman easily establishes her claims of discrimination and retaliation and, accordingly, respectfully requests that CRD issue a reasonable cause finding in this matter.

I. Dr. Lyman engaged in protected activity by repeatedly reporting concerns of the Company's disparate treatment of female scientists to her supervisors.

Initial Therapeutics falsely contends that Dr. Lyman never raised concerns of discrimination with respect to the Company's treatment of her or her subordinates. However, as Dr. Lyman's contemporaneous records demonstrate, she raised concerns regarding the Company's disparate treatment of female scientists both to her direct supervisor, Senior Vice President of Biology Dr. Peiwen Yu, and her department's head, Chief Scientific Officer ("CSO") Dr. Phil Patten. Dr. Lyman's protected activity includes the following incidents.

A. Dr. Lyman raised concerns with Dr. Yu that two of her female direct reports were "under-titled" for their experience, while contrasting the Company's rapid promotion of a male scientist.

Soon after joining the Company, Dr. Lyman discovered that a number of her female colleagues were hired into roles that were more junior than their qualifications warranted. The Company maintains a career ladder that details the typical education and experience required for each role. Ex. 1, Spring 2023 R&D Career Ladder. According to this career ladder, employees with PhDs were eligible for positions as Scientist I, Scientist II, Senior Scientist I, Senior Scientist II, Principal, or Fellow, depending on the number of years of their post-PhD experience. *Id.* at 4. As relevant here, the ladder stated that a Scientist I required a PhD and 0-2 years of industry experience, while for a Scientist II the stated criterion was a PhD and 2-5 years of relevant post-PhD (inclusive of postdoc) experience. Given that an average period of postdoctoral study is at least two years, this strongly implies that a scientist who had undertaken postdoctoral study would typically be hired as Scientist II, not Scientist I, even if that individual had no prior biotech experience.

Dr. Lyman's direct reports, Ilsa Kirby and Esraa Mohamed (both women), worked at the Company since April 2021 and April 2022, respectively. At the time of their hires, both women had over two years of postdoctoral experience, yet the Company hired them into the Scientist I position reserved for scientists with less than 2 years of post-PhD experience. *See* Exs. 2, I. Kirby Resume; 3, E. Mohamed LinkedIn. Meanwhile, the Company did not appear to under-hire male scientists. For example, Initial Therapeutics hired another junior employee, Fred Ward, in March 2021, one month before he completed his PhD, and therefore with no postdoctoral or industry experience—and substantially less experience than Drs. Kirby and Mohamed—into the same Scientist I position. Initial Therapeutics quickly promoted him to the Scientist II position in March 2023, at which time he had under two years of post-PhD experience. See Ex. 4, F. Ward LinkedIn. The Company only promoted Dr. Mohamed to Scientist II in August 2023, at a point when she had over four years of post-PhD experience, compared to Dr. Ward's then-two years and four months of experience, having already been Scientist II for five months. *Compare id. with* Ex. 3.

In late 2023, Dr. Lyman began discussing concerns with Dr. Yu that Drs. Ilsa Kirby and Mohamed were "under-titled" for their experience. In November or December 2023, Dr. Lyman suggested that the Company make a one-time "retro-correction" to adjust the titles of prior hires who had been under-titled, advocating specifically that Drs. Kirby and Mohamed receive a retroactive correction to make their titles commensurate with the Company's guidelines. On or around January 3 2024, Dr. Yu rejected Dr. Lyman's suggested proposal. The same day, Dr. Lyman emailed Dr. Kirby, with another team member copied, to describe her conversation with Dr. Yu, her efforts to advocate for the Company to retroactively adjust the titles of Drs. Kirby

and Mohamed (denoted as "EM"), and Dr. Yu's refusal to do so. *See* Ex. 5, January 3, 2024 Email from S. Lyman.

While Dr. Yu eventually promoted Dr. Kirby to the Scientist II position in late February 2024, she simultaneously promoted Dr. Ward to the Senior Scientist I position, even though he had less than three years of total post-PhD experience and the ladder stated that the Company required *five to eight* years of post-PhD experience for the Senior Scientist I position. Ex. 1, at 4. Dr. Lyman observed that Dr. Ward had been promoted to the Scientist II position less than a year prior, in March 2023, despite have less post-PhD experience than Dr. Lyman's female direct reports for whom she had advocated to receive commensurate promotions to the Scientist II position. In a note on March 2, 2024, Dr. Lyman recalled a conversation with Dr. Yu on or around February 28, 2024, in which she raised concerns regarding the Company's disparate promotion practices, noting how quickly the Company had promoted Dr. Ward, as compared to its delayed promotion of Dr. Kirby, despite Dr. Lyman's advocacy. *See* Ex. 6, March 2, 2024 Email to S. Lyman (noting Dr. Lyman's discussion with Dr. Yu that "F (Dr. Ward) promo[ted] so fast"). Dr. Yu dismissed Dr. Lyman's concerns by justifying the Company's promotion because Dr. Ward oversaw an entire scientific function. *Id.* Dr. Lyman responded by noting that Dr. Kirby, likewise, managed an entire scientific function – the screening assays. *Id.*; *see also* Ex. 7, February 29, 2024 Promotions Email (describing Dr. Kirby's management of her team with respect to cell-based assays).

B. Dr. Lyman raised concerns with her direct manager, Dr. Yu, regarding disparate career opportunities afforded to her all-female team.

During a one-on-one meeting with Dr. Yu on October 27, 2023, Dr. Lyman raised concerns regarding the disparate career development opportunities afforded to her all-female team, and the impact on her team's morale. Dr. Lyman noted that the Company did not invite her subordinates to present their own data at externally facing meetings, including the scientific advisory board ("SAB"), but rather invited a male colleague, Dr. Ward, who had not performed the work, to present the data. *See* Ex. 8, October 27, 2023 Texts Between S. Lyman and M. Winter (stating that Dr. Lyman told her manager that "she was concerned for the career Dev and morale of [her] team [w]hen their colleague presents their data at SAB instead of them"). Dr. Yu acknowledged Dr. Lyman's concerns and encouraged her to "be patient" for changes within the Company and with respect to Dr. Patten's management. *Id.* (noting that Dr. Yu had told her to "[b]e patient" and "[c]hange takes time").

During another one-on-one meeting with Dr. Yu on January 25, 2024, Dr. Lyman reiterated concerns that the Company had invited Dr. Ward to present data at SAB in the place of her subordinate, Dr. Mohamed, who had performed the experiments the data was based upon. Dr. Lyman requested that Dr. Mohamed or other scientists who had done the work (who were female) be able to present data at the external meeting. *See* Ex. 9, January 25, 2024 Email to S.

Lyman (noting that she had asked "why FE [sic] (Dr. Ward) was present[]ing PD data at SAB instead of EM (Dr. Mohamed)" and also "[a]sked PY (Dr. Yu) for EM or others who did the exp[eriment]s to be able to present."). Dr. Yu claimed that she did not have decision-making authority on presenters. *Id.* (noting that Dr. Yu had responded, "[I]t's not my decision.")

C. Dr. Lyman raised concerns with Dr. Patten regarding her observations of the disparate career opportunities afforded to female scientists at the Company, and that she herself was under-titled for her experience.

In January 2024, Dr. Lyman requested a meeting with Dr. Patten over growing concerns regarding the Company's culture. Dr. Lyman first met with Dr. Patten on January 26, 2024, at the end of which she requested another meeting to finish relaying her concerns. Dr. Patten responded, "Time for more bitching." *See* Ex. 10, January 27, 2024 Email to S. Lyman.

Dr. Lyman met with Dr. Patten again on January 31, 2024. Over the two meetings, Dr. Lyman relayed her concerns that she was "under-titled" for her position. She noted that, on January 30, Initial Therapeutics had advertised a higher-level Senior/Executive Director position requiring candidates to have a minimum of 20 years of relevant industry experience based on an "[e]quivalent combination of education and experience," while she, at the time, held 23 years of relevant post-PhD experience and was only titled at a Director level. *See* Ex. 11, Senior/Executive Director Job Ad; Ex. 12, S. Lyman Resume; *see also* Ex. 13, January 30, 2024 Email to S. Lyman (noting topics she planned to address with Dr. Patten during the January 31 meeting). Including her doctoral education, Dr. Lyman had almost 30 years of experience. Ex. 12. Based on this posting, and her observations of the Company's under-titling of female scientists, Dr. Lyman asked to discuss an adjustment to her title and pay, believing that she should be titled at a Senior Director level in light of her extensive experience. Ex. 13.

II. The Company's Purported Performance Justifications for Demoting Dr. Lyman and Terminating Her Employment Are Pretextual.

The evidence does not support Initial Therapeutics's contention that it changed Dr. Lyman's title from Director to Principal Senior Scientist, and then terminated her employment, due to purported performance concerns attributed to her "negativity," all just weeks after she asked for a title and pay adjustment to correct past discrimination.

A. Initial Therapeutics rated Dr. Lyman's performance as "fully meets expectations" and Biology leadership commended her performance shortly before the Company demoted her and terminated her employment.

On February 26, 2024, Dr. Lyman received her 2023 Annual Review from Dr. Yu. Dr. Yu rated Dr. Lyman's overall performance as "fully meets expectations." *See* Ex. 14, 2023 Annual Review, at 12.

Dr. Lyman's review was favorable. The review raved that Dr. Lyman is "careful and enthusiastic about science with a heart for a very detail-oriented approach to providing broad information on the projects and tasks she worked with." It stated that Dr. Lyman "exhibits strength in her evident passion for science, attention to technical detail, and desire to support scientists in her reporting line." The review also complimented a presentation Dr. Lyman gave at a c-Myc core meeting, and stated that Dr. Lyman "ensures her teams are updated with meeting summaries from c-Myc core team and RRC meetings," noting that this practice is "commendable." The review further noted that Dr. Lyman does "a great job" supervising lab work, "provid[es] valuable technical advice" to her direct reports, and "ensur[es] the high quality of data generated by her teams." The Company's review of Dr. Lyman's performance also complimented Dr. Lyman's handling of "conflicts or critical matters" within her team, and noted that she has sought career development opportunities for members of her team. Also according to the review, "[o]ne of [Dr. Lyman's] strengths was [that she was] not afraid to voice her and others' opinions, ask key questions, and raise disagreements to open discussion in public settings." *Id.* at 11.

Dr. Lyman's performance review also identified minor areas of improvement—none of which included the Company's post-hoc characterization of Dr. Lyman's pervasive "negativity"—including: to provide less detail in her written communications, to turn in all work product before the deadline, to provide Dr. Yu with an email list of any deliverables after her one-on-one meetings, and to be "more flexible and open-minded." *Id.*

Notably, though the Company asserts that it had discussed documented performance concerns with Dr. Lyman in 2023, Dr. Lyman was frustrated by her annual review meeting with Dr. Yu because she had repeatedly previously sought performance feedback from Dr. Yu, yet Dr. Yu had failed to provide timely feedback as concerns were noted. *See* Ex. 15, February 26, 2024 Email to S. Lyman (noting that Dr. Yu claimed it was not realistic for her to have provided feedback to Dr. Lyman within a few days of precipitating events).

Notwithstanding Dr. Lyman's concerns that she was "under-titled" for her experience, she endeavored to develop a positive working relationship with Dr. Eric Johnson, whom the Company hired into the newly created role of Executive Director, Discovery Sciences. Early into his start at the Company, Dr. Johnson favorably remarked on Dr. Lyman's performance and experience, noting that "he didn't have some of [her] expertise." See Ex. 16, March 19, 2024

Texts Between S. Lyman and F. Caiazza (noting that Dr. Johnson had previously told Dr. Lyman that "he didn't have some of [her] expertise.").[1]

B. The Company suddenly terminated Dr. Lyman's employment after she challenged her demotion as retaliatory, based on pretextual justifications.

On March 19, 2024, during what she anticipated to be an initial one-on-one meeting with her new supervisor, Dr. Lyman was surprised to see that she and Dr. Johnson would be joined by Human Resources ("HR") consultant Jackie Rauh. Dr. Johnson and Ms. Rauh informed Dr. Lyman that the department was undergoing a reorganization to flatten the management structure. Dr. Lyman would become an "individual contributor" and her team of six— Dr. Kirby, Dr. Mohamed, and their respective direct reports—would be taken from her, as Drs. Kirby and Mohamed were to begin reporting to Dr. Johnson. There was no mention of a title change during their conversation.

Dr. Lyman felt blindsided by the news, which she informed Dr. Patten of during a meeting the same day. Dr. Patten stated that he understood her position, noting that he had encountered a similar situation in which his team was "taken away from him" and he also experienced "strong acute emotion" over the change. *See* Ex. 18, March 19, 2024 Email to S. Lyman. Dr. Lyman observed that, while Dr. Patten had been warned about the change and afforded time to process so as not to be "broadsided," she had not been afforded the same courtesy by Initial Therapeutics prior to the March 19 meeting. *Id.*

On March 20, 2024, Dr. Lyman participated in the departmental meeting during which the Company announced the change to the organizational structure. Towards the start of the meeting, Dr. Lyman made it clear that she would graciously support this transition in any way she could and that she believed Dr. Johnson would be a good manager for her now-former team. During the meeting, Initial Therapeutics presented a slide presentation of the changes that would be put into effect. Dr. Lyman noticed, for the first time, that her title would be changed to "Senior Principal Scientist," effectively demoting her from her Director position to a non-management track scientific role—a change that the Company had not discussed with her during the March 19 meeting. *See* Ex. 19, March 20, 2024 Emails between S. Spurlock and P. Patten (Sandy Spurlock noting that Ms. Rauh had merely listed the title change in the revised organization structure included in the presentation, and specifying that Director and Senior Principal Scientist roles were not considered equal in the industry); *see also* Ex. 20, March 20, 2024 Cellular Biology Meeting, at 6 (denoting title change in small print). Because she had not yet been informed about this title change, Dr. Lyman asked Ms. Ruah why her title was being

[1] In early to mid-March, Dr. Lyman also learned from a colleague that Dr. Patten had complimented Dr. Lyman's work ethic, characterizing her as a "beast" with exceptional work ethic and focus. *See* Ex. 17, Post-It of March 2024 Comments by Dr. Patten.

changed, to which Ms. Ruah only gave a curt reply. While this news upset her, Dr. Lyman dropped the matter and made no further comments about her title change. Dr. Lyman's now-former team members were also upset by the manner in which the Company had announced her demotion. *See, e.g.,* Ex. 19 (noting that the Company's demotion of Dr. Lyman appeared "very retaliatory"); Ex. 21, March 21, 2024 Texts Between S. Lyman and G. Lee (noting that Dr. Lyman had found out about her title change and move to a non-management scientific track during the March 20 meeting, to which she and several of her team members had pushed back).

Despite the shock and humiliation of how she just learned of her title change and demotion, Dr. Lyman sought to positively transition out of her Director position, while supporting Dr. Johnson's leadership. After the meeting, Dr. Lyman emailed her former team about her "positive" impression of Dr. Johnson, raving that she considered him "a very nice person" who would be "an excellent manager" that her team could "learn a lot from." See Ex. 22, March 20, 2024 Email from S. Lyman. Dr. Lyman hoped that this email, as well as her positive comments at the meeting, would make this transition smoother.

The following day, on March 21, Dr. Johnson informed Dr. Lyman that Ms. Rauh and Dr. Patten would be present at their meeting scheduled for March 22 to discuss details about the change and Dr. Lyman's new role. That afternoon, Dr. Lyman spoke with Dr. Johnson, who informed her that her comments during the March 20 meeting had been viewed as inappropriate by some on the leadership team, and that the Company planned to offer her a severance package, if she chose not to remain in the new position. This was quite confusing for Dr. Lyman because she barely spoke at the meeting except to support management and the transition. That same day, she learned from a colleague, who had overheard Dr. Johnson and Dr. Patten discuss plans for the March 22 meeting, that Dr. Patten had expressed the Company's fears of potential litigation from female employees and that they needed to "shut it down." *See* Ex. 23, March 22, 2024 Texts between S. Lyman and G. Lee.

On March 22, 2024, Dr. Lyman met with Dr. Johnson, Dr. Patten, and Ms. Rauh to discuss the new team structure and her new position. Dr. Patten opened the meeting by offering Dr. Lyman the opportunity to either resign with severance or remain employed in the Senior Principal Scientist role. He then said that if Dr. Lyman decided to stay at Initial Therapeutics, the Company would not tolerate her further "negatively venting" about leadership to colleagues. Dr. Lyman acknowledged that she had vented to colleagues on a few occasions, but noted that venting about the Company's leadership was pervasive amongst employees. She elaborated that Dr. Patten should be aware of this common venting from communications he had with other employees as well as an HR investigation that had been conducted regarding pervasive negative conduct on the part of another employee, Mariwil Wong. *See* Ex. 24, March 23, 2024 Email to S. Lyman.

Dr. Lyman also addressed her concerns that the decision to remove her team and change her title represented a retaliatory demotion in "retribution" for having been outspoken about her concerns of disparate treatment by the Company. *See* Ex. 25, March 22, 2024 Texts between S. Spurlock, I. Kirby, and S. Lyman (stating that she felt she "wasn't being treated fairly" and the response felt like "retribution," given that she "had been vocal about a lot of things in [her] time [t]here."). Dr. Lyman stated that she had been effectively demoted due to the title change, which she had been shocked to discover during the March 20 meeting, because she had now been relegated to a research track title without team oversight. She noted that Dr. Grace Lee, a former employee, had held a position as an Associate Director on the management track, without any direct reports. Dr. Patten acknowledged that it had not occurred to him that the Company had previously maintained an employee in a director-level position without reporting oversight. *See* Ex. 26, March 22, 2024 Texts Between S. Lyman, S. Spurlock, and I. Kirby. Noting the Company's justification that the removal of Dr. Lyman's team was necessary to ensure a flat structure that promoted efficiency, she questioned leadership on why the Company had not instead re-organized Dr. Ward's team, which performed assays and screenings in line with Dr. Johnson's experience, particularly as Dr. Ward had only just reached three years of post-PhD experience, whereas she had 23 years of experience. *Id.* (noting that the divestment of her team "felt like retribution," particularly as the Company could have more efficiently re-organized Dr. Ward's (FW) team to report to Dr. Johnson).

On March 26, the day that Dr. Lyman was required to decide about the severance package, she was ill with stomach issues. Early that morning, she emailed Dr. Johnson to inform him that she was sick and unable to come into work, but did not plan to take the severance. *See* Ex. 27, March 28, 2024 Texts Between S. Lyman and G. Lee (noting that Dr. Patten (PP) had texted Dr. Lyman on her personal phone on March 26 to inform her that he still wanted to hold the planned meeting that day, despite her illness, though she had informed Dr. Johnson (EJ) that she "would[n']t be taking the severance pkg"). In Dr. Lyman's email to Dr. Johnson, she also asked several questions about the new role, which she had accepted by rejecting the severance package. These questions related to the logistics of her new role, including clarifying a comment Dr. Patten had made during the March 22 meeting, stating that her new "biomarker role would potentially have dotted line matrix relationship with some of [her] team," regarding whether she would be expected to "advise people on exp[eriment] plan and analysis" or "only see data when it's published." *See* Ex. 28, April 2, 2024 Texts Between S. Lyman and I. Kirby (noting the clarifying questions she had sent leadership about the Senior Principal Scientist role). She did not receive a response to her questions.

On March 29, Dr. Lyman had a meeting with Dr. Johnson and Ms. Rauh, which had been rescheduled from March 26. Dr. Johnson told Dr. Lyman that Initial Therapeutics was terminating her employment. He then read a prepared statement that proffered three justifications for the termination. First, Dr. Johnson said that Initial Therapeutics interpreted her "repeated questions" about the title change associated with the new role to mean that she was

refusing the role. Second, Dr. Johnson said that Dr. Lyman was not suited to or qualified for a Director role. Third, Dr. Johnson said that Initial Therapeutics terminated Dr. Lyman's employment because she behaved "inappropriately" during the March 20 team meeting (in which the Company announced Dr. Lyman's demotion in front of her entire team). *See* Ex. 29, March 29, 2024 Texts Between S. Lyman and F. Caiazza.

These justifications are patently pretextual. First, Dr. Lyman had clearly rejected the severance offer, and therefore decided to remain employed with the Company in the new role. Dr. Lyman's clarifying questions about the operation of her work in no way demonstrated an intention to reject the position. Second, the Company had recently rated her performance in the Director role as "fully meets expectations" in her February 2024 Annual Review. Third, while understandably upset to learn of her demotion, Dr. Lyman clearly behaved professionally during the March 20 meeting. Moreover, the Company offered Dr. Lyman the option to remain at Initial Therapeutics on March 22, two days *after* her purportedly "inappropriate" behavior during the March 20 team meeting.

III. The Company is Liable for Unlawful Discrimination and Retaliation.

A. Initial Therapeutics discriminated against Dr. Lyman and other female scientists on the basis of their sex.

To establish a sex discrimination claim, Dr. Lyman must show that (1) she was a member of a protected class; (2) she was qualified for the position she held; (3) she was subjected to an adverse employment action, such as termination; and (4) some other circumstance suggests discriminatory motive. *Brandon v. Rite Aid Corp.*, 408 F. Supp. 2d 964, 972 (E.D. Cal. 2006). A plaintiff may establish a *prima facie* case of disparate treatment by showing that similarly situated individuals outside her protected class were treated more favorably. *Nicholson v. Hyannis Air Serv., Inc.*, 580 F.3d 1116, 1123 (9th Cir. 2009). Once a plaintiff establishes a prima facie case, the burden shifts to the employer to produce evidence of a legitimate, nondiscriminatory reason for the employment decision. *Id.* Legitimate reasons are those that are "facially unrelated to prohibited bias, and which, if true, would thus preclude a finding of discrimination." *Guz v. Bechtel Nat. Inc.*, 24 Cal. 4th 317, 358 (2000). If the employer produces evidence of a legitimate nondiscriminatory reason for its actions, the plaintiff must then show that the employer's stated reason for the employment decision was pretext for discrimination. *Id.* at 354-56.

Dr. Lyman can demonstrate unlawful sex discrimination by Initial Therapeutics. Dr. Lyman is a woman who was qualified for the Director position she held, as demonstrated by her positive performance feedback a month prior to her abrupt termination. Dr. Lyman suffered adverse employment actions when Initial Therapeutics hired her into a lower position, delayed her promotions, denied her opportunities for advancement, demoted her, and terminated her

employment. *See Chuang v. Univ. of California Davis, Bd. of Trustees*, 225 F.3d 1115, 1126 (9th Cir. 2000) (explaining that an employment action is adverse for purposes of Title VII claim if it "materially affect[s] the compensation, terms, conditions, or privileges of . . . employment"); *Muldrow v. St. Louis*, 601 U.S. 346, 350 (2024) (holding that an employee transferred to a different position with the same compensation and level because of a protected characteristic makes out a claim under Title VII so long as the employee identifies "some harm," even if the harm incurred is not "significant."); *Yanowitz v. L'Oreal USA, Inc.*, 36 Cal. 4th 1028, 1054 (2005) (termination is an "ultimate employment action[].").

Dr. Lyman will be able to demonstrate that Initial Therapeutics's adverse actions were motivated by her sex because the Company's "treatment of women differed sufficiently in quality and quantity from [its] treatment of men to support a claim of sex-based discrimination." *E.E.O.C. v. Nat'l Educ. Ass'n, Alaska*, 422 F.3d 840, 844 (9th Cir. 2005). Initial Therapeutics's hiring of male scientists (but not female scientists) into positions commensurate with their experience, and its timely promotion of male scientists (but not female scientists) indicates that the Company held male and female scientists to different standards. *See Babot v. Equilon Enterprises LLC*, No. 18-CV-04802-DMR, 2020 WL 3833282, at *6 (N.D. Cal. July 8, 2020) (stating that evidence that a male employee was held to a more favorable standard than female employees may constitute prima facie evidence of a discriminatory motive). Furthermore, the Company's general discriminatory culture, including an environment tolerant to sex-based remarks, providing limited career opportunities for female employees, and failure to promote female employees, demonstrates a pattern of sex discrimination which provides further evidence that Initial Therapeutics's adverse treatment of Dr. Lyman was based on her sex. *See Lynn v. Regents of Univ. of California*, 656 F.2d 1337, 1343 (9th Cir. 1981) ("Proof of a general pattern of sex discrimination is, in any event, evidence which tends to establish that it is 'more likely than not' that a[n] [employer's] decision [] was based on sex."). Finally, Dr. Patten's reference to Dr. Lyman's complaints as "bitching" and his musings about whether or not this "bitching" made Dr. Lyman a "bitch" is direct evidence of his discriminatory intent against women. *See Reeves v. Sanderson Plumbing Prods., Inc.*, 530 U.S. 133, 152 (2000) (rejecting argument that, as a matter of law, discriminatory remarks must be made "in the direct context" of an adverse employment decision); *Earl v. Nielsen Media Rsch., Inc.*, 658 F.3d 1108, 1113 (9th Cir. 2011) ("[C]omments from supervisors betraying bias or animus" against members of the protected class constitutes "direct evidence of discrimination.").

Even if Initial Therapeutics were able to meet its burden of producing evidence of a legitimate, nondiscriminatory reason for terminating Dr. Lyman based on purported performance concerns, she can also easily demonstrate that the reason constitutes pretext for discrimination. Pretext may be inferred by looking at "the plaintiff's job performance, the timing of events, and how the plaintiff was treated in comparison to other workers." *Colarossi v. Coty U.S. Inc.*, 97 Cal.App.4th 1142, 1153 (2002). Dr. Lyman can demonstrate that she was meeting expectations according to a performance review issued a month prior to her termination, had received

exceedingly positive feedback from the Company's leadership, and was provided the option of remaining with the Company two days after it claims she exhibited "negative" and "inappropriate" behavior warranting termination.

B. Initial Therapeutics retaliated against Dr. Lyman for reporting concerns of its disparate treatment of female scientists.

To establish a *prima facie* case of retaliation, Dr. Lyman must show (1) she engaged in a protected activity, (2) she suffered an adverse employment action, and (3) there was a causal link between the protected activity and the adverse employment action. *See Davis v. California Dep't of Corr. & Rehab.*, 484 F. App'x 124, 128 (9th Cir. 2012) (Title VII and FEHA).

Dr. Lyman can demonstrate a *prima facie* case of retaliation. She clearly engaged in protected activity by reporting concerns of discrimination to her supervisors, including on October 27, 2023, in late January 2024, and on March 2, 2024. *See Hanson-Poulsen v. California*, No. CV176628DMGAFMX, 2018 WL 11462103, at *4 (C.D. Cal. June 26, 2018) (finding that plaintiff's complaints about "environment that fostered gender bias" constituted protected activity under FEHA, Title VII, and Labor Code § 1102.5). As the California Supreme Court has explained, "an employee is not required to use legal terms or buzzwords when opposing discrimination." *Yanowitz*, 116 P.3d at 1134; *see also Mertes v. Wynne*, No. CIVS061742LKKGGH, 2007 WL 3203004, at *13 (E.D. Cal. Oct. 29, 2007) ("There is no requirement that plaintiffs utter a magic word, such as 'discrimination,' in order to oppose a discriminatory practice."). Dr. Lyman complained that female employees, including herself, were under-titled, promoted more slowly than male colleagues, and given fewer opportunities than their male colleagues. Her complaints, "read in their totality, oppose discrimination." *Yanowitz*, 116 P.3d at 1134.

The temporal proximity between Dr. Lyman's protected activity and these adverse actions is alone sufficient to give rise to an inference of causation. *See Villiarimo v. Aloha Island Air, Inc.*, 281 F.3d 1054, 1065 (9th Cir. 2002) ("[C]ausation can be inferred from timing alone where an adverse employment action follows on the heels of protected activity"); *Garcia v. City of Everett*, 728 F. App'x 624, 628 (9th Cir. 2018). Dr. Lyman escalated her concerns to Dr. Patten in late January 2024, and addressed further concerns with Dr. Yu on March 2, 2024, and the Company demoted her then terminated her employment by the end of March 2024: This extremely close temporal proximity establishes a causal link. *See Ayala v. Frito Lay, Inc.*, 263 F. Supp. 3d 891, 912 (E.D. Cal. 2017) (finding that FEHA plaintiff sufficiently plead a causal link between her engagement in protected activity and adverse action where she engaged in protected activity and was terminated two months later); *Yartzoff v. Thomas*, 809 F.2d 1371, 1376 (9th Cir.1987) (finding evidence of causation where adverse actions occurred less than three months after plaintiff engaged in protected activity). Notably, the Company's strong disapproval of what it characterized as her "negativity" towards leadership—the substance of which involved her criticisms of the Company's disparate treatment of female scientists—is also evidence of

causation. *See McCoy v. Dep't of Army*, 789 F. Supp. 2d 1221, 1233 (E.D. Cal. 2011); *see also Bell v. Clackamas County*, 341 F.3d 858, 866 (9th Cir.2003) (temporal proximity of plaintiff's complaints and adverse employment actions, together with evidence of superiors' contemporaneous displeasure with complaints, provided circumstantial evidence of retaliation). To put it bluntly, the retaliatory animus towards Dr. Lyman was palpable.[2]

Initial Therapeutics will be unable to demonstrate a legitimate, nonretaliatory reason for demoting Dr. Lyman and terminating her employment. While Initial Therapeutics claims to have fired Dr. Lyman for this behavior, it has not disciplined any other employee for their "outbursts" during this meeting, or similarly reprimanded an employee investigated for allegedly engaging in pervasive, negative conduct—evidence that the true explanation for the Company's actions was retaliatory. *See Taylor v. FedEx Freight, Inc.*, No. 1:16-CV-0438-BAM, 2017 WL 4022757, at *9 (E.D. Cal. Sept. 12, 2017).

Furthermore, Dr. Lyman can easily prove that the Company's proffered reasons for demoting her and terminating her employment are pretextual. As described above, the Company's effectuation of the re-organization is inconsistent with its goals of flattening the structure and improving efficiency, and its decision to terminate Dr. Lyman in response to her March 20 conduct is at odds with its decision to offer to retain her only a few days after she displayed the behavior it claims to find problematic. *See Godwin v. Hunt Wesson, Inc.*, 150 F.3d 1217, 1222 (9th Cir. 1998), as amended (Aug. 11, 1998) (explaining that material inconsistencies between the employer's "contemporaneous reasons" for the adverse action and the explanation advanced during litigation are evidence of pretext). Moreover, the Company has offered shifting reasons for its decision to terminate her employment, including its post-hoc reason that Dr. Lyman demonstrated pervasive "negativity" by raising reasonable questions about the operation of her new role. *Culver v. Qwest Communs. Corp.*, 306 Fed. Appx. 403, 405 (9th Cir. 2009) ("Shifting reasons" are "fundamentally different justifications for an employer's action [that can] give rise to a genuine issue of fact with respect to pretext since they suggest the possibility that neither of the official reasons was the true reason.").

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[2] There are many examples of management's hostility to Dr. Lyman's concerns. When Dr. Yu first gave Dr. Lyman feedback on her performance in December 2023, among otherwise very positive feedback, Dr. Yu said that Dr. Lyman should "focus on the science," meaning that she should not be raising concerns about sex discrimination as she had been. More blatantly, as described above, in late January 2024, Dr. Patten used sexist slurs to characterize Dr. Lyman's reports of sex discrimination. Even in the days leading up to Dr. Lyman's termination, her colleagues reported back to Dr. Lyman that Dr. Patten sought to conspire with Dr. Johnson to "shut down" potential litigation by female employees. These and other interactions with management showed Dr. Lyman that the Company had no tolerance of her efforts to combat rampant sex discrimination.

IV. Conclusion

Given the clear, contemporaneous evidence of Dr. Lyman's protected conduct, the discrimination prevalent within Initial Therapeutics's culture, and the plainly pretextual nature of the Company's justifications for its adverse actions, Dr. Lyman has established strong claims for discrimination and retaliation under FEHA and Title VII. Dr. Lyman therefore respectfully requests that CRD issue a reasonable cause finding in her favor. Please let us know if you have any questions, or if we can provide any further information to assist CRD in its investigation.

Sincerely,



Bethel Habte
Attorney for Susan Lyman

Encl.

cc. Dr. Susan Lyman
Nicolas O'Connor, Esq.

EXHIBIT 1

initial

R&D Career Ladder

Spring 2023

Initial Therapeutics confidential

Promotion Criteria

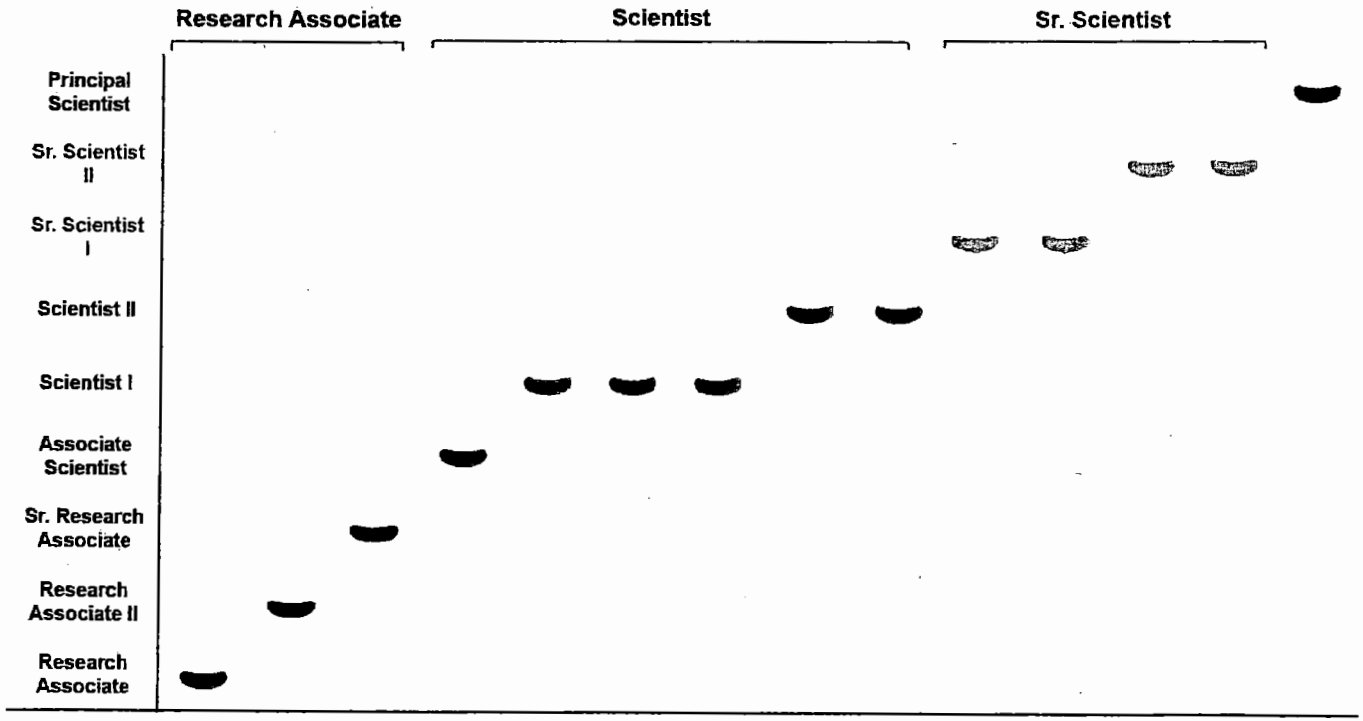
- **Purpose**
  - Initial Therapeutics believes in providing opportunities for its employees to advance within the organization. Promotion opportunities to positions of higher responsibility will be based on organization needs, excellent performance, demonstration of Initial's core values, and requisite knowledge and capabilities.
- **Definition**
  - Promotion is the movement of a full-time exempt employee to a higher level either within the same department or to another department due to a change in job scope.
- **Eligibility**
  - Any employee in good standing that meets the following criteria is eligible for promotion consideration:
  - Minimum one year of service
  - Excellent performance
  - Increase job scope for a business need



Purpose of career ladder

- Provide competencies required for each level, not just years of experience
- Guideline for professional growth and development planning
- Talent acquisition tool
  - Develop job description qualifications
  - Develop behavioral and situational interview questions

Position, education and years of relevant experience



Research Associate I

Summary	Carries out standardized routine lab work following established protocols, learns good scientific technique through working and interacting with more senior staff.
Knowledge & Technical Application	Develops basic scientific/technical skills through routine tasks.
Planning and Scientific Independence	• Learns protocols and experimental design and follow them consistently under close supervision. • Plans their work with supervisor, proactively asks for guidance when necessary • Capable of reading, understanding & discussing scientific literature. • Decision making requires discussion with manager
Problem Solving	Reviews literature and industry best practices to improve or troubleshoot existing protocols
Oral and Written Communication	• **Written skills:** takes direction and document experimental design and records data, able to document and write detailed protocol(s), effectively communicates work status. • **Presentation skills:** able to collect and handle raw data and prepare basic graphs for presentations.
Teamwork and Collaboration	• Listen carefully to others, taking time to understand and ask appropriate, clarifying questions without interrupting before the other person has completed their thought. • Effectively manage or seek help in managing conflict, interact with and respect diverse personalities, and meet ambiguity with resilience. • Be accountable for individual and team responsibilities and deliverables. Ask for clarification if you are unclear on what your responsibilities are or are unclear on procedures. • Proactively offer to assist your colleagues if you perceive that they are overloaded and could use help.
Typical Degree & Experience	BS or MS Degree and a minimum of 0 - 2 years of relevant experience.

Research Associate II

Summary	Carries out complex experiments with some oversight
Knowledge & Technical Application	Develops, applies, & implements solutions to basic technical problems under supervision.
Planning and Scientific Independence	Organizes own work effectively to meet deadlines. Reviews and suggests modification to experimental design. Able to perform more advanced statistical analysis. Independently seeks out guidance from more experienced staff.
Problem Solving	Under supervision, identifies & defines a new problem as well as recommends possible solutions for approval.
Oral and Written Communication	• **Written skills:** able to formulate and write conclusions from technical experiments, notices potential discrepancies or issues in data and brings them to the attention of the manager. • **Presentation skills:** organizes multiple sets of raw data for presentation. Takes direction on creating specific plots and figures, may present a small portion with direction. Comfortable surfacing confusing or inconsistent data in group setting with recommended solutions.
Teamwork and Collaboration	• Listen carefully to others, taking time to understand and ask appropriate, clarifying questions without interrupting before the other person has completed their thought. • Effectively manage or seek help in managing conflict, interact with and respect diverse personalities, and meet ambiguity with resilience. • Be accountable for individual and team responsibilities and deliverables. Ask for clarification if you are unclear on what your responsibilities are or are unclear on procedures. • Proactively offer to assist your colleagues if you perceive that they are overloaded and could use help.
Typical Degree & Experience	BS or MS Degree and a minimum of 2 - 4 years of relevant experience inclusive of MS degree.

Senior Research Associate

Summary	Highly skilled in a technical area, capable of performing data analysis and in-depth technical support. Trains other staff in their domain of expertise.
Knowledge & Technical Application	• Can adapt complex protocols, consulting literature and expert input. • Independently chooses between limited alternatives to solve moderately technical problems.
Planning and Scientific Independence	• Independently develops timelines for procedures and experiments. • Able to draw conclusions and define next steps based on current data. • Informs managers about decisions that are made.
Problem Solving	Independently identifies & defines a new problem as well as recommends possible solutions for approval.
Oral and Written Communication	• **Written skills:** draws next steps from individual experiments and able to propose them clearly in the form of a research proposal. • **Presentation skills:** takes direction on creating complete presentations flows (story), may be able to create and present segments of presentation, including appropriate plots, figures and tables.
Teamwork and Collaboration	• Listen carefully to others, taking time to understand and ask appropriate, clarifying questions without interrupting before the other person has completed their thought. • Effectively manage or seek help in managing conflict, interact with and respect diverse personalities, and meet ambiguity with resilience. • Be accountable for individual and team responsibilities and deliverables. Ask for clarification if you are unclear on what your responsibilities are or are unclear on procedures. • Proactively offer to assist your colleagues if you perceive that they are overloaded and could use help.
Typical Degree & Experience	BS or MS Degree and a minimum of 4 - 6 years of relevant experience inclusive of MS degree

Associate Scientist

Summary	Expert in a scientific domain and associated technical skills. Works independently on moderately complex projects.
Knowledge & Technical Application	Seen as "go-to" expert for technical problem solving in their area of expertise.
Planning and Scientific Independence	• Independently designs, performs, and analyzes experiments to test hypotheses of moderate complexity. • Makes decisions about direction of experiments. • Identifies and suggests implementation of new ideas from literature uses scientific knowledge frequently.
Problem Solving	• Chooses between existing solutions or develops new solutions to solve moderately complex problems. • Leverages literature research and collaboration with domain experts. Assists others in problem solving.
Oral and Written Communication	• **Written skills:** Synthesize results and conclusion from multiple experiments into full study report and determine next steps to achieve project goal(s). • **Presentation skills:** Creates, organizes and presents complete scientific presentation(s) that draws from multiple experiments.
Teamwork and Collaboration	May serve as departmental representative in the project team as needed.
Management and Leadership	May supervisor entry level research associates. Provides direction and oversight of assignments.
Typical Degree & Experience	MS degree and minimum 4-6 years relevant experience or BS degree with 6+ years relevant experience

Scientist I

Summary	Advanced expert in a scientific domain, with working knowledge across multiple areas of expertise. Actively collaborates with other disciplines to drive highly complex projects.
Knowledge & Technical Application	Develops novel solutions to technical problems with advanced complexity in their area of expertise.
Planning and Scientific Independence	• Collaborates with other experts to design, perform and analyze experiments to test hypotheses of high complexity and meet project goals. • Routinely investigates and creates innovative processes, hypotheses and methods.
Problem Solving	• Able to make, recommend and act on decisions for problems. Assists others in solving complex problems through use of literature, counseling internal or external experts.
Oral and Written Communication	• **Written skills**: Able to write journal-quality technical documentation(s) and contribute to patent claim(s). • **Presentation skills**: Strong ability to analyze and present convey complex scientific concepts in same knowledge area. Can effectively communicate in larger group (e.g., program teams)
Teamwork and Collaboration	• Serves as departmental representative on project teams. • Is aware of the over all project goals and is highly sensitive to the project needs within their competency and how their work fits • in within the project and influences other activities within the project.
Management and Leadership	• Begins to coach others on creating scientific presentation(s) to RA/SRA. • Assigns tasks and monitors work of the team, while also performing individual tasks.
Typical Degree & Experience	Normally requires a PhD in a scientific discipline and 0-2 years relevant industry experience. MS degree and minimum ≥8 years or BS degree with ≥12 years relevant experience. Exceptional individuals with less experience may be hired or promoted based on demonstrated performance in one or more key Sci-I level areas.

Scientist II

Summary	Independent senior expert who leads medium sized project teams and provides significant impact to the company's scientific and patent output. Demonstrated track record of leadership qualities, scientific creativity, productive collaboration with others and independent thought.
Knowledge & Technical Application	• Solves complex technical problems within a broad domain of expertise. • Regularly develops novel solutions & introduces new technologies and concepts.
Planning and Scientific Independence	• Independently designs, performs and analyzes highly complex experiments and develops new protocols, hypotheses and methods. • Comfortable making decisions with incomplete information.
Problem Solving	• Independently makes decisions in the interest of the project team and has an understanding of the budget, timelines and resources that decision impacts. • Helps small groups, and/or more junior staff think through their hypotheses and decision-making.
Oral and Written Communication	• **Written skills:** able to author review journal articles and cross-functional memorandums • **Presentation skills:** experience presenting at scientific conferences outside of company. Ability to engage audience in Q&A. Ability to convey complex scientific concepts in other scientific areas.
Teamwork and Collaboration	• Is capable of effectively training, directing and providing guidance to other personnel - both direct reports and outside reporting line. • Plans work and sets timelines • Understands and works seamlessly with business processes. • Example: able to identify and engage consultants; understand and navigate the process of getting CDAs, contracts, etc.,
Management and Leadership	Begins to coach others on creating scientific presentation(s) to Scientist/Sr. Scientist. Assigns tasks, and effectively provides direct supervision, acts as guide to resolve problems in meeting timelines.
Typical Degree & Experience	Normally requires Ph.D. in a scientific discipline and 2-5 years relevant post PhD (inclusive of postdoc); BS/MS with ≥10 years experience in R&D. Exceptional individuals with less experience may be hired or promoted based on demonstrated performance in one or more key Sci-II level areas.

Senior Scientist I

Summary	Plans & manages complex experiments, projects and research teams. Recognized externally as a scientific leader through presentations and publications in at least one designated R&D area. Has sound knowledge of other areas that helps guide departmental decisions.
Knowledge & Technical Application	• Frequently creates innovative solutions that open new ground for scientific exploration within the domain of expertise. • Identifies & develops scientific strategies to support mid-term goals and set direction for sub-departments..
Planning and Scientific Independence	• Leads exploration of complex questions and advances understanding in a key area for the department. • Strategic thinking and thought-leadership within projects and departmental focus areas.
Problem Solving	Anticipates complex technical problems & develops practical and innovative solutions within their domain of expertise
Oral and Written Communication	• **Written skills:** able to write scientific articles to non-scientific personnel. **Presentation skills:** ability to convey complex scientific concepts to non-scientific audience.
Teamwork and Collaboration	• May drive new initiatives independently based on scientific experience. • Works with Management to ensure alignment with Company commitments and resource budgets.
Management and Leadership	Mentors' others on scientific presentation. Oversight of experienced level scientists. Frequently advises teams on moderately complex problems.
Typical Degree & Experience	Normally requires Ph.D. in a scientific discipline and 5-8 years relevant post PhD (inclusive of postdoc); BS/MS with ≥14 years relevant experience in R&D. Exceptional individuals with less experience may be hired or promoted based on demonstrated performance in one or more key Sci-II level areas.

Senior Scientist II

Summary	A strategic leader in the organization who oversees and manages the activities of other lower level personnel within the department.
Knowledge & Technical Application	• Multi domain expert who leads key scientific initiatives in unexplored scientific areas. • Integrates external expertise to provide critical strategic input for the R&D focus of the company.
Planning and Scientific Independence	• Leads exploration of complex questions across the department. • Identifies & develops scientific strategies to support longer-term goals & sets direction on the functional level.
Problem Solving	• Exercises foresight & good scientific judgement in planning, organizing and guiding complex projects. • Provides critical input & scientific judgement in complex and unprecedented situations with a broad impact on the R&D focus of the company.
Oral and Written Communication	**Written skills:** strong expert scientific writing skills, able to write final documentation to regulatory agencies. **Presentation skills:** sought-after thought-leader and expert presenter.
Teamwork and Collaboration	• Gathers input from management & colleagues to shape department objectives and identify and address critical issues. • Aligns functional resource budgets to achieve company goals. • Identifies opportunities and coordinates cross-functional creation of key scientific and patent-related documents within the department.
Management and Leadership	• Leads key initiatives and may lead cross-functional teams. • Mentors others on scientific presentation. • Oversight of experienced level scientists. • Frequently advises teams on moderately complex problems.
Typical Degree & Experience	Normally requires Ph.D. in a scientific discipline and 8-12 years relevant post PhD (inclusive of postdoc); BS/MS with ≥16 years relevant experience in R&D. Exceptional individuals with less experience may be hired or promoted based on demonstrated performance in one or more key Sci-II level areas.

Principal

Summary	Initiates, directs and executes the scientific research and/or development direction for a company through a research staff (or independent study), which are critical and have a high impact on corporate strategies and image.
Knowledge & Technical Application	• Participates in the development of critical applications. Maintains broad knowledge of state-of-the-art principles and theory. • Investigates the feasibility of applying a wide variety of engineering/scientific principles and concepts to potential inventions, products and problems.
Planning and Scientific Independence	Initiates, directs and executes the scientific research and/or development direction for a company through a research staff which are critical and have a high impact on corporate strategies and image. Investigates the feasibility of applying a wide variety of engineering/scientific principles and concepts to potential inventions, products and problems.
Problem Solving	• Maintains broad knowledge of state-of-the-art principles and theory. • This position is recognized as a published expert within a discipline.
Oral and Written Communication	• **Written skills:** first or last author of scientific journal articles, able to teach scientific writing skills, able to publish research in the most prestigious journals • **Presentation skills:** sought-after thought-leader and expert presenter
Teamwork and Collaboration	• Participates in project decision making. • Often facilitates group discussions for effective discussions and consensus building.
Management and Leadership	Participates in management and professional development of research group
Typical Degree & Experience	Normally requires a PhD in a scientific discipline and minimum of ≥15 years relevant experience.

Fellow

Summary	• Directs and develops strategy and activities necessary to complete major company milestones that impact the business overall, requiring a wide variety of technical and managerial skill. • Recognized as an international leader in the scientific field.
Knowledge & Technical Application	Champions innovative solutions with broad organizational impact.
Planning and Scientific Independence	• Plans and contributes to the development and implementation of companies' scientific strategy. • Required to make complex decisions and troubleshoot in ambiguous situations across the company.
Problem Solving	Anticipates problems and needs across the whole company. Provides practical and innovative advice and solutions based on broad knowledge of company goals and priorities.
Oral and Written Communication	• **Written skills:** First or last author of scientific journal articles, able to teach scientific writing skills, able to publish research in the most prestigious journals. • **Presentation skills:** Qualified expert witness.
Teamwork and Collaboration	• Spearheads major scientific initiatives crossing multiple departments. • Influences business decisions related to the department by performing in-depth analysis and identifying potential cross-functional strategic initiatives. • Facilitates and leads team meetings.
Management and Leadership	Participates in management and professional development of research group.
Typical Degree & Experience	Normally requires a PhD in a scientific discipline and minimum of 20 years relevant experience.

EXHIBIT 2

Ilsa Kirby, Ph.D

San Francisco, CA | (541) 520-7442 | ilsa.t.kirby@gmail.com | www.linkedin.com/in/ilsa-kirby-phd

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CHEMICAL BIOLOGIST focused on designing small molecules, developing biological assays, and working with multidisciplinary teams to advance drug discovery research.

SKILLS | Chemical Biology | Drug Discovery | Medicinal Chemistry | SAR | Biological assay development | Cellular and molecular biology | Organic synthesis | Protein chemistry | Cellular imaging | Mammalian cell culture | Biochemical techniques | Interdisciplinary scientific communication | Data visualization |

RESEARCH EXPERIENCE

Initial Therapeutics, Inc., a biotechnology company developing drugs to inhibit protein synthesis

Scientist II, Discovery Biology **January 2024 – present**
Scientist I, Discovery Biology April 2021 – January 2024

Founded cellular biology group at Initial Therapeutics
- Researched and acquired equipment to build BSL2 cell culture facility
- Developed in-house suite of cellular screening assays for multiple programs
- Set company standard practices for assay execution, data handling, and analysis
- Established company-wide data management system

Led cellular screening assay development and execution for multiple programs
- Adapted assay technology to HTS platform for target discovery and hit-expansion screening
- Led cellular screening assay development and execution for series A lead program
- Delivered key biological data to drive SAR efforts for multiple programs, including IND-enabling data package for Series A lead program
- Prepared scientific updates for senior management and investors
- Contributed to the writing and publication of patents describing translation inhibitors

Key contributor to *in vitro* and *in vivo* PD marker discovery as part of a cross-functional team
- Identified key biomarkers for IND-enabling studies of series A lead program
- Developed biochemical assays for biomarker quantification in cellular and *in vivo* study samples - Established IND-enabling PK/PD relationships for Series A lead program
- Decreased analysis time 3-fold for *in vivo* biomarker studies

Supervised and mentored 2 FTEs to support assay development for multiple programs

Shokat Lab | University of California, San Francisco
NRSA Postdoctoral Fellow, Dept. of Cellular and Molecular Pharmacology March 2019 – April 2021

Developed oncogenic-mutant selective translation inhibitors
- Developed *in vitro* translational assay for Ras family oncogenic and chemical-genetically tractable variants to study covalent translation inhibitors
- Designed and validated a sub-micromolar covalent inhibitor of $KRas^{G13C}$ protein translation
- Elucidated biochemical MOA of covalent translation inhibitors by leveraging biochemical and cellular techniques

Supervised and mentored 1 intern and 2 graduate students

Cohen Lab | Oregon Health and Science University

Graduate Student Researcher, Dept. of Physiology and Pharmacology Oct 2014 – Jan 2019

Elucidated role of PARP11-mediated ADP-ribosylation in nuclear pore complex stability

- Developed first family-wide enzyme activity assay for ADP-ribosylating proteins (PARPs) to characterize off-target effects clinical stage PARP1 inhibitors
- Executed biochemical and cellular SAR campaigns, leading to the first-in-class intra-family selective PARP inhibitor with nanomolar potency
- Discovered the role of PARP11-mediated ADP-ribosylation in nuclear pore complex stability

Supervised and mentored 2 interns and 3 graduate students

EDUCATION

Ph.D in Cellular and Molecular Biology, 2019

Oregon Health and Science University; Advisor: Prof. Michael S. Cohen

Thesis: Towards Selective Poly-ADP-ribose Inhibitors

Bachelor's Degree in Chemistry, 2014

Reed College; Advisor Prof. Aaron Nilson

Thesis: A Series of Unfortunate Compounds: improving the solubility of host-targeted antivirals

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SELECT PUBLICATIONS (out of 16 total)

Kirby, IT, Person, A., & Cohen, M. Rational design of selective inhibitors of PARP4. *RSC medicinal chemistry,* 2021, *12*(11)

Kirby IT, Sanderson DJ, Cohen MS. PASTA: PARP activity screening and inhibitor testing assay. *STAR Protoc.,* 2021, *2*(1)

Kirby IT, Kojic A, Arnold MR, Thorsell A-G, Karlberg T, Vermehren-Schmaedick A, *et al.* A Potent and Selective PARP11 Inhibitor Suggests Coupling between Cellular Localization and Catalytic Activity. *Cell Chemical Biology*, 2018, *25*(12)

Kirby IT, Morgan RK, Cohen MS. A Simple, Sensitive, and Generalizable Plate Assay for Screening PARP Inhibitors. In: ADP-ribosylation and NAD+ Utilizing Enzymes. *Springer Methods and Protocols*, 2018, *1813*

SELECT ACADEMIC PRESENTATIONS (out of 9 total)

Kirby, I.T. *Towards Selective PARP Inhibitors.* Oral presentation at: EMBO Chemical Biology Conference. *August 29th-September 1st, 2018; European Molecular Biology Laboratory, Heidelberg, Germany.*

Kirby, I.T. *Understanding the role of PARP11 in nuclear pore complex biology*. Oral presentation at: Bioorganic Chemistry Gordon Research Conference and Seminar. *June 9th-15th 2018; Proctor Academy, Andover NH*

Kirby, I.T. *Selective Inhibition of the mono-PARP Subfamily*. Oral presentation at: Janelia Junior Scientist Workshop on Solving Biological Problems with Chemistry. *April 8th-12th 2018; Janelia Research Campus, Ashburn VA*

EXHIBIT 3

https://www.linkedin.com/in/esraa-m-mohamed/



Esraa Mohamed · 1st

Initial Therapeutics

Scientist at Initial Therapeutics

San Francisco Bay Area · **Contact info**

204 connections

Julius Khoo, Will Holland, and 13 other mutual connections

About

Highly passionate, motivated, and innovative translational scientist with strong expertise in cancer and neurobiology. Extensive experience in developing cell-based assays to understand compound's mechanism of action. Excellent ability to work independently and collaboratively. Seeking to grow as a scientific leader in translational science.

Experience

Initial Therapeutics
Full-time · 2 yrs 5 mos

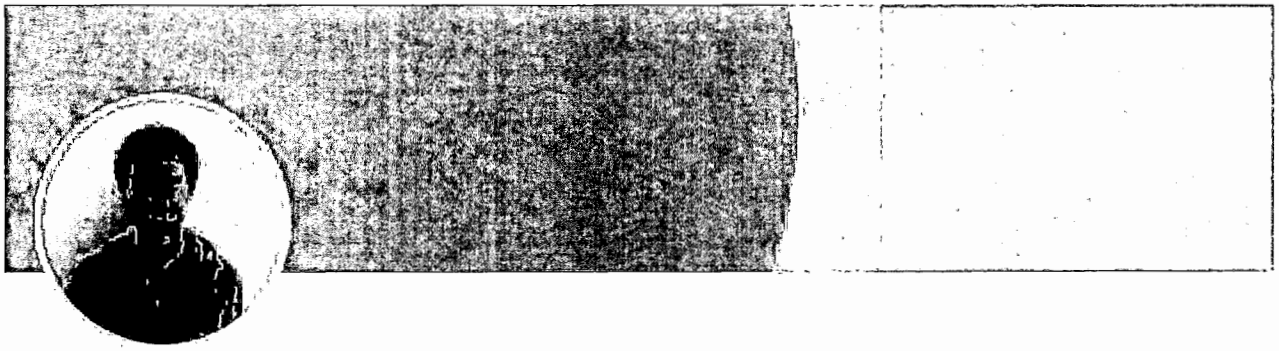
- **Scientist II**
  Aug 2023 - Present · 1 yr 1 mo
  On-site
- **Scientist**
  Apr 2022 - Aug 2023 · 1 yr 5 mos
  California, United States

Postdoctoral Researcher
University of California, San Francisco · Full-time
Sep 2019 - Apr 2022 · 2 yrs 8 mos
San Francisco Bay Area

PhD Graduate Student
Virginia Commonwealth University School of Medicine
Aug 2013 - Aug 2019 · 6 yrs 1 mo
Richmond, Virginia Area

EXHIBIT 4

Note that Fred wasn't even officially a PhD at the time he was hired – I think he was still writing up his thesis and being an ITx employee at the same time
https://www.linkedin.com/in/fred-ward-889b36143/



Fred Ward · 1st
Scientist at Initial Therapeutics
South San Francisco, California, United States · **Contact info**
346 connections
Sandra Spurlock, Peiwen Yu, and 13 other mutual connections

Initial Therapeutics
University of California, Berkeley

Experience

Initial Therapeutics
3 yrs 6 mos
South San Francisco, California, United States

- **Senior Scientist**
  Feb 2024 - Present · 7 mos
- **Scientist II**
  Full-time
  Mar 2023 - Feb 2024 · 1 yr
- **Scientist I**
  Full-time
  Mar 2021 - Mar 2023 · 2 yrs 1 mo

Education

University of California, Berkeley
PhD, Molecular and Cell Biology
Aug 2015 - Apr 2021

MCB PhD working in Jamie Cate's Lab. Research on ribosome structural biology, ribosome engineering, and small molecule regulators of translation.

EXHIBIT 5

Bethel Habte

From: Susan Lyman <slyman@initialtx.com>
Sent: Wednesday, January 3, 2024 2:48 PM
To: Ilsa Kirby
Cc: Sandy Spurlock
Subject: context on my slip

Hey guys (primarily IK, but Sandy as a FYI!),

Just wanted to clarify the accidental slip that I made just now – I had proposed to PY that anyone who was hired with a PhD and postdoc should really be strongly considered for a one-time bump up in title, independent of the review process.

This would be to recognize that hiring has not been consistent with the official guidelines – for early hires (and actually also for current hires like SS and AC ☹)

I suggested that this be messaged as a one-time fix and to say "we acknowledge that hires prior to the establishment of the guidelines may not adhere to the guidelines; this is a one time retro-correction for that"

This is what was I was proposing that PY said no to, and what I was referring to when I made my slip (effectively she said no to it for you too, since I had advocated that you and EM both be bumped up retroactively).

Anyway – I feel bad that I let that slip, but wanted to clarify the background and context :)

IK – the other bump-up route that we have talked about (the traditional one) is still planned! Docs due Monday…it's on one of my post-it notes. I will look forward to expanding my post-it landscape with the new WINGS courtesy of Sandy. WOOHOO!!!

Susan Lyman ▪ Director - Tumor biology & biomarkers ▪ Initial Therapeutics ▪ 285 E. Grand Ave ▪ South San Francisco, CA 94080

EXHIBIT 6

Susan Lyman

Sent - iCloud March 2, 2024 at 10:09 PM

Talk to P

To: slyman@initialtx.com

Te F promo so fast
Neglecting fact that he's not doing much managing bc he doesn't have support re how to deal with tesm

Neglecting WH snd Steve who provide much of his success

PY was very defensive in telling me he was promoted

Says
He has an e tire function

Yes maybe
But if so, so did Ilsa have an e tire function re screening assays!

EXHIBIT 7

Bethel Habte

From: Peiwen Yu <pyu@initialtx.com>
Sent: Thursday, February 29, 2024 9:38 AM
To: Employees; Jackie Rauh; Phil Patten
Subject: Promotion announcement

It is with great pride and enthusiasm that we announce two well-deserved promotions in Biology. These two highly talented scientists were both Initial Biology founders and have contributed greatly to Initial's proprietary technology and science. Their skills in scientific rigor, dedication, productivity, leadership, and team spirit have had a major impact on Initial's growth and success.

Fred Ward promotion to Senior Scientist I

Fred managed to optimize the IVT assay and throughout, better support SAR for both c-Myc and ARV7 with clear benefits to company goals, and to advance projects. He also did a great job pursuing the mechanism of action (MOA) of ISR by successfully developing the global translation inhibition assays in a variety of cells. Fred successfully led the 'omics' functionality including transcriptomics, ribosome binding & profiling, proteomics, and bioinformatics projects. His team generated high-quality omics and ribosome profiling data not only to advance the biomarkers and MOA characterization, but also significantly support board, SAB, and BD meetings. Fred shows resilience in tackling the obstacles by reading papers, seeking help, and testing all the possible factors. Fred is an excellent scientist, provides great scientific leadership to his team, and leads a high-performance team with great productivity.

Fred has demonstrated great potential and capacity to grow his scientific leadership as a manager. He demonstrated great leadership in keeping his team organized, communicating priorities, and focusing on our company goals. Fred hired good scientists who teamed up very well to make good progress in all activities in his group. Fred has served as an effective advocate in generating key data that routinely support company goals and achievements. His job scope has been expanded to lead the project of new target screening.

Fred has a great sense of urgency, excellent work ethic, and accountability to drive for high-quality results. He has performed to the next level of Senior Scientist I with his scientific competency and excellent performance. Please join us in congratulating Fred on his accomplishments and his well-deserved promotion.

Ilsa Kirby promotion to Scientist II

It is with great pleasure to announce the well-deserved promotion of Ilsa to the Scientist II. As an early employee (#3) of Initial, Ilsa has been dedicatedly involved in helping build the company from the ground up, using both her chemical biology and cell biology skills. Ilsa has made major contributions to the weekly SAR support for both the c-Myc and pan-AR programs. As an individual contributor as well as a manager, Ilsa successfully expanded her team to increase the capacity and diversity of cell-based assays including the BrdU proliferation, IncuCyte cell Live/death assays, etc. has been extremely useful in assessing cell growth phenotypes and informing mechanistic hypotheses.

Ilsa successfully developed the p21 ELISA for tumor PD analysis and demonstrated the 1st PK/PD relationship for ITC compound. Ilsa is also championing the in vitro chemo/combo initiative for the c-Myc program, which could be extremely impactful for clinical design and BD interest.

Ilsa's leadership skills are demonstrated in her taking the time to train new CDD users, QC uploaded data, and create CDD templates. Ilsa has demonstrated an excellent can-do attitude and is always willing to help out the urgent requests, such as polishing the executive slide decks.

Ilsa's has performed at the next level of Scientist II with her scientific achievements, accountability, and productivity. Please join me in congratulating our new Scientist II.

Thanks

Peiwen

Peiwen Yu, Ph.D.
SVP, Biology
Initial Therapeutics
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Email: pyu@initialtx.com
initial

EXHIBIT 8

Mike Winter 10/27/23

I told her I had same concerns as Grace

Though my day to day had more freedom

Since I wasn't sent unchsngeBle study designs by the CSO

I told her I had same concerns as Grace

Though my day to day had more freedom

Since I wasn't sent unchsngeBle study designs by the CSO

I told her that I was concerned for the career Dev and morale of my team

When their colleague presents their data at SAB instead of them

Though they do like him very much snd know it's not his doing

Said I had secondary concerns for myself

Mentioned that even she as SVP isn't making her own decisions on many things

What chance do I as director have??

She said
Be patient
Change takes time

EXHIBIT 9

Susan Lyman January 25, 2024 at 9:59 PM

Po fdbk

To: slyman@initialtx.com

Favoritism
I asked why FE was present ring PD data at SAB instead of EM

Asked PY for EM or others who did the exps to be able to present

She said it's not my decision

I said why???

She said you may notice that I'm (PY) not present ring either

EXHIBIT 10

Susan Lyman
RK PP
To: slyman@initialtx.com

January 27, 2024 at 10:05 AM

Pp comment on mtg part 2

"Time for more bitching "

Bring this up her her and him

Tell him I felt bad about his use of that word

Hoped he didn't feel I was "bitching"

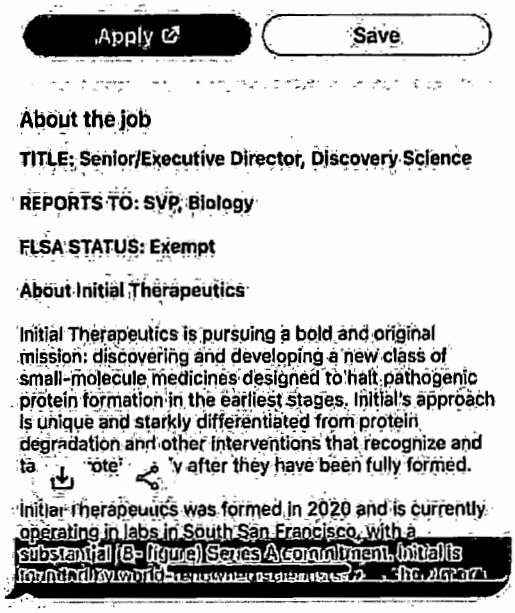
I spent a lot of time thinking about feedback and writing notes

Bc more people than me in bio find PY to be difficult in some ways

EXHIBIT 11

GL_0044_2024.01.30





BioSpace

Senior/Executive Director; Discovery Science

South San Francisco, CA · 7 months ago

-

- $200K/yr - $280K/yr HybridMatches your job preferences, workplace type is Hybrid. Full-timeMatches your job preferences, job type is Full-time.

-

  11-50 employees · Internet News

- See how you compare to 6 applicants. Try Premium for $0

No longer accepting applications

About the job

TITLE: Senior/Executive Director, Discovery Science

REPORTS TO: SVP, Biology

FLSA STATUS: Exempt

About Initial Therapeutics

Initial Therapeutics is pursuing a bold and original mission: discovering and developing a new class of small-molecule medicines designed to halt pathogenic protein formation in the earliest stages. Initial's approach is unique and starkly differentiated from protein degradation and other interventions that recognize and tackle proteins only after they have been fully formed.

Initial Therapeutics was formed in 2020 and is currently operating in labs in South San Francisco, with a substantial (8- figure) Series A commitment. Initial is founded by world-renowned scientists who bring relevant expertise and proprietary technology to enable them to address high-confidence, heretofore difficult-to-drug targets in cancer and neurodegeneration. Screening of proprietary libraries is in progress.

Initial Therapeutics is founder-led and offers a dynamic start-up environment with a close-knit team of highly skilled, mission-driven professionals. We seek colleagues who are inspired to push the boundaries of small molecule discovery using novel approaches and who excel at identifying innovative solutions to challenging problems.

At Initial Therapeutics you'll find a career where every day brings you adventures, challenges, and breakthroughs. Join a dynamic, diverse, and growing team dedicated to developing transformative therapies that will revolutionize the future of cancer treatment and outcomes. Initial offers a competitive compensation and benefits package.

Position Summary

Initial Therapeutics is seeking an experienced, highly motivated scientific leader to develop and drive a portfolio-wide oncology discovery pipeline from target validation, lead optimization, and to development compound characterization. The successful candidate will be a dynamic, experienced individual, with strong assay development expertise and operational experience to build a highly performing in vitro assay team in a fast-paced environment to support oncology R&D. The ideal candidate must be independently driven, passionate, innovative, an excellent team player, and committed to high-quality data to drive programs forward with scientific excellence and urgency.

Primary Responsibilities

- Collaborate across internal functions to develop strong in vitro assay strategies, implement a robust SAR engine, and drive for results to advance the discovery pipelines. Support the executive leadership to manage budget, priorities, and workforce plans to achieve a mechanistic understanding and support SAR for the timely achievement of company goals. Help build a productive assay team to ensure excellence in the execution of programs, processes, and initiatives. Translate scientific and resource business strategies to drive strategic outcomes. Serves as a primary contact and assay expert across teams to support the research goals, execution, and delivery of high-quality in vitro data to support the oncology pipeline.

Contribute to authorship of documents supporting IND, clinical trials, and scientific manuscripts when needed. Foster a science-driven, goal-oriented culture that values innovation, teamwork, agility, transparency, accountability, and empowerment. Stay up to date on emerging data and current trends in oncology research to support oncology pipelines. Participate with other function leaders to provide input on the effectiveness and development of company operational policies and procedures. Conduct scientific presentations to senior management, project teams, and internal and external collaborations. Manage laboratory records in a complete, consistent, and concise manner under company intellectual property policies and practices.

Qualifications/Skills

- Proven strong track record and expertise with extensive experience in in vitro assay development and drug discovery. Strong sense of urgency and scientific focus with effective communication skills to drive for results and delivery are extremely important. Demonstrated extensive experience in target validation, mechanism of action, hit-to-lead, and lead optimization plans to assist IND-enabling studies. Excellent interpersonal skills, high ethical standards, and outstanding written and verbal skills to communicate effectively with executive leadership. A strategic thinker with excellent leadership skills, and prior project leader roles with deep expertise in oncology discovery, signaling pathways, and assay development is highly preferred. Strong leadership with influencing and collaboration skills to work in a team-oriented environment to build strong teamwork with cross-function leaders to enable high performance. Strong track record of scientific productivity as evidenced by high-quality, impactful publications. Strong research expertise in the field of molecular and cellular biology and ribosomal biology is a plus. Excellent project management and organization skills to multi-task, prioritize options, anticipate challenges, and execute goals as a member of an interdisciplinary team is essential. Makes effective and persuasive presentations on sensitive or complex topics to senior management, external customers, collaborators, and public groups. Thrives in a collaborative team setting and driven by a strong commitment in oncology research at a fast-paced start-up environment.

Key Leadership Competencies

- Highly self-motivated, dedicated, proactive, and organized with strong management and presentation skills. Foster effective communications between cross-functional teams and to support the executive leadership. Directs the activities of one or more functional areas, or groups with overall responsibility for the direction of those assigned areas. Has overall responsibility for planning and implementing assigned budget.

Education / Experience

- A Ph.D. in molecular and cellular biology or related fields with a minimum of 20 years of relevant industry experience in cancer drug discovery and development. Equivalent combination of education and experience Effective people management experience

Disclaimer

The preceding job description has been designed to indicate the general nature and level of work performed by employees within this classification. It is not designed to contain or be interpreted as a comprehensive inventory of all duties, responsibilities and qualifications required of employees assigned to the job.

Salary Range

The salary range for this position is $200,000.00 to $280,000.00 per annum. Compensation will be determined based on several factors including, but not limited to, skill set, years of experience.

Vaccination Policy

Initial Therapeutics requires employees to be vaccinated for COVID-19.

Location:

This position is located in South San Francisco, CA. Current work location is on site.

Set alert for similar jobs

Senior Executive, South San Francisco, CA

Pay found in job post

Retrieved from the description.

Base salary

$200,000/yr - $280,000/yr (from job description)

Qualifications

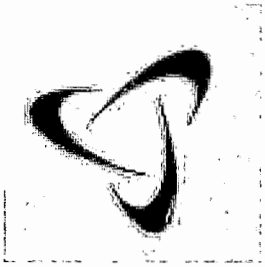
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EXHIBIT 12

Susan K. Lyman, PhD

sklyman@gmail.com
650.872.8510
South San Francisco, CA 94080
http://www.linkedin.com/in/susanlyman

PROFILE:

- 20+ years post-PhD research experience, including 15.5 years of biotech experience in oncology drug discovery and development for biologics (Ab, ADC, T-cell engager) and small molecule therapeutics
- Energetic, curiosity-driven scientist: tenacious, imaginative, and practical approach to problem solving
- Expertise in preclinical and clinical translational studies, biomarker discovery and assay development, CRO management, and oncology discovery research (cancer biology, target validation / therapeutic MOA)
- Skilled in providing tactical and strategic guidance to develop both projects and people
- Experienced and attentive small-group leader: demonstrated ability to effectively communicate scientific vision, and to shape a positive, engaging, and productive group culture
- Robust communication and relationship-building skills – within primary team and across functions
- Strong foundation for drug discovery research: 17 publications, PhD from University of California - Berkeley, postdocs at Scripps Research Institute and Harvard Medical School, Damon Runyon Postdoctoral Fellow

WORK EXPERIENCE:

Initial Therapeutics ♦ South San Francisco, CA **2023 - 2024**

Director, Tumor Biology & Biomarker Research

- Led a team of 6 in biomarker discovery, novel assay development, and SAR support for multiple small molecule programs aimed at selective inhibition of nascent chain - ribosome complexes
- Project team biology representative for 2 preclinical programs; contributed to IND strategic planning
- Key contributor to exploration of biomarker hypotheses, support of indication selection, and combination therapy planning - using both *in vitro* and *in vivo* approaches
  - Guided strategic planning, execution, and interpretation of PD analysis for mouse model tumors
  - Developed conceptual framing for initial combo strategy and combo agent selection
- Responsible for ensuring robust SAR cell-based assay support / weekly data for hit selection and lead optimization for 2 programs: in first 2 weeks on the job, solved months-long "noisy data" problem
- Created new and effective communication channels for data sharing and hypothesis building amongst groups (biomarker research, ribosome biology, and *in vivo* pharmacology)

CytomX Therapeutics ♦ South San Francisco, CA **2017 - 2022**

Director, Translational Sciences	2022
Associate Director	2019 - 2022
Senior Scientist II	2017 - 2019

- Led a team of 4 scientists to support translational research for Probody therapeutics (Pb-Tx; novel masked biologics that are selectively activated in the tumor)
- Accountable for translational studies for 4 clinical-stage programs covering a range of therapeutic modalities - Pb-Tx, Pb-drug-conjugate (Pb-Tx version of ADC), Pb-bispecific – including the following:
  - In-house and outsourced biomarker assays, assay qualification, selected MOA studies
  - Selection and study design for *in vivo* models (PDX and CLX), PK/PD and correlation analyses
  - Extensive CRO management, from vendor selection to final report delivery
- Translational project team representative for 3 late-preclinical stage Pb-Tx programs
  - Developed PD and/or predictive biomarker strategy for analysis of preclinical samples and plan for "real-world" data (commercial biosamples); worked with my team to implement those strategies
  - Contributed biomarker sections to clinical protocol and associated documents (e.g. lab manual)
  - Biomarker representative on the transition team for advancing one of these pre-IND programs (masked T-cell engager) to Phase 1; biomarker representative on clinical-stage team
- Co-designed strategies to identify exploratory predictive and PD biomarkers in preclinical, commercial (blood / tissue) and clinical samples, using unbiased and biased methods
  - Approaches included proteomics, genomics, transcriptomics, and targeted multi-analyte platforms
  - Responsible (with my team) for platform assessment, vendor selection, CRO management
  - Partnered with CRO for analysis of large -omics data sets
  - Identified reliably high-quality biosample vendors; sourced a large set of blood and tumor samples to generate "real world" -omics data
- Developed and qualified novel Pb-Tx activation assay and generated the first "proof of platform" data demonstrating tumor-selective unmasking of Pb-Tx in patient tissue biopsies
- Developed method of quantifying masked / unmasked Pb-Tx in tumor and blood, enabling occupancy calculations and correlation analysis of Pb-Tx activation with response, payload, target levels, etc.
- Worked cross-functionally with Discovery Research, Clinical Development, Clinical Operations, Clinical Data Management, Biometrics, and Regulatory / Medical Writing
- Recipient of "CEO Values Award" for the core value of Integrity; recipient of numerous spot awards for "above and beyond" contributions

Gilead Sciences ♦ Foster City, CA **2011 - 2015**

Senior Scientist I, Oncology* 2014 - 2015 (*Sr. Sci I at Gilead was equivalent to Sr. Sci II at most other biotechs)

Scientist II* 2011 - 2013 (*Sci II at Gilead was equivalent to Sr. Sci I at most other biotechs)

Contract Scientist (Arresto Biosciences - 2010: Arresto was acquired by Gilead in Jan 2011)

- Leader of 5-member biology core team for assessment of early-stage small molecule oncology target; successfully demonstrated preclinical proof-of-concept validation (*in vitro* and *in vivo*)
  - Biology representative for project team; also took on extensive benchwork to ensure biology core team met aggressive data delivery timelines
  - Developed and refined cell-based assays for small molecule screening / lead validation, PD readouts, and oncogene-dependence; designed and analyzed *in vivo* studies
  - Profiled sensitivity to novel small molecule inhibitors in >75 cell lines using 3D tissue culture and (jointly with colleague) assessed same lines in clonogenic survival assays:
  - Demonstrated key POC genotype sensitivity correlations
- Co-led translational research effort for anti-MMP9 therapeutic antibody; contributed to IND filing
  - Responsible for model evaluation, study design, CRO oversight, and analysis for >20 *in vivo* studies
  - Contributed to indication selection by carrying out an extensive literature survey to assess correlation of MMP9 levels with survival and recurrence in 15 solid tumor types
- Developed, optimized, qualified, and executed biomarker assays for the LOXL2 antibody clinical program
  - Generated patient sample data establishing LOXL2 as a correlative biomarker for the severity of fibrotic disease
- Supervised 2 direct reports; developed a junior research associate with no prior biotech experience
- Received 6 "Gilead GThanks" awards in recognition of teamwork, collegiality, and contributions
- Nominated as mentee participant in Gilead Mentor program (2014-2015), in which high-potential employees were paired with cross-functional senior mentors to facilitate career development

Exelixis ♦ South San Francisco, CA **2006 - 2010**

Senior Scientist I, Target Discovery 2010

Scientist II 2007 - 2009

Contract Scientist 2006

- Coordinated team of 7 researchers for phenotypic characterization of XL888 (small-molecule HSP90 inhibitor); acted as liaison between XL888 teams in Biology and Translation Medicine
  - Developed novel high-content, high-throughput cell cycle analysis assay (Cellomics), provided high-resolution cell cycle data on the effects of HSP90 inhibitors on cell growth

- Designed and executed cell-based target validation / /MOA assays for multiple small molecule targets
- Led a team of 3 colleagues in screening of ~40,000 siRNAs in a high-content imaging assay (Cellomics) to identify target genes responsible for MYC-induced apoptosis
  - Contributed substantially to screening benchwork, analyzed and compiled data, devised data-handling protocols and hit stratification strategies
- Supervised and developed a junior research associate with no prior biotech experience
- Received 3 "EXEL-ence" awards for teamwork and significant contributions to company goals

Akceli ♦ Cambridge, MA **2002 - 2003**

Scientist II 2002 - 2003

- Designed and executed analyses of cellular function using "reverse transfection" microarray platform

EDUCATION:

Harvard Medical School ♦ Boston, MA

Postdoctoral Fellow: *Dr. Randy King, advisor*

- Carried out high throughput, high-content imaging screen on ~10,000 siRNAs to identify novel cell cycle control genes / oncology targets

The Scripps Research Institute ♦ La Jolla, CA

Postdoctoral Fellow: *Dr. Larry Gerace, advisor* *(Damon Runyon Postdoctoral Fellow)*

- Demonstrated novel role for the small GTPase RAN in nuclear import of large cargo molecules

University of California at Berkeley ♦ Berkeley, CA

PhD in Molecular and Cell Biology *(National Science Foundation Predoctoral Fellow)*

Dr. Randy Schekman *(PhD advisor for last 3 years of thesis work)*

- Discovered new mechanistic role for molecular chaperones in protein translocation in yeast ER

Dr. Harrison Echols *(PhD advisor for first 2.5 years - Dr. Echols passed away from cancer during my 3rd year)*

- Contributed to development of new paradigm for chaperone-mediated protein folding

Augustana College ♦ Sioux Falls, SD

B.A. *magna cum laude* in Biology & Chemistry (double major) *(National Merit Scholar)*

TECHNICAL SKILLS / PRIOR EXPERIENCE:

- **Translational research:** design and analysis of *in vivo* studies, biomarker and/or PD assay development and qualification, biomarker identification (biased and unbiased approaches), bioanalysis of tumors and blood products, CRO management
- **Cell-based assays**: development of novel assays for target identification and validation, high-content image-based immunofluorescence assays (Cellomics), proliferation and apoptosis assays, live-cell timelapse imaging, ELISA, MSD/Meso Scale Discovery, 3D tissue culture (various techniques), mammalian cell culture
- **Automation and liquid handling**: writing, running, and troubleshooting programs for Agilent Bravo, PlateMate, RapidPlate, BioMek-FX, HPD300e
- **Protein and nucleic acid analysis**: capillary immuno-electrophoresis (CEI / Protein Simple), immunoblotting (Odyssey), immunoprecipitation, IP-kinase assays, qPCR / Taqman
- **Data management and presentation**: Excel power-user (pivot charts, lookup tables, advanced formulas), Spotfire, GraphPad Prism, Cellomics vHCSView, SoftMaxPro, PowerPoint, Word, Adobe Illustrator

PUBLICATIONS : See PubMed for article links

(for publication entry directly below - late-stage manuscript draft has been completed; finalization & submission is pending bandwidth of current CytomX team)

Lyman, SK, Winter, MB., Lam, B, Zein, IA, DuPage, A, Stroh, M, Moore, S J, Eskens, F, Autio, K, Uboha, N, Garcia-Corbacho, J, de Vries, E, Bendell, J, Cho, D, Boni, V, Thistlethwaite, F, Naing, A, Lu, H, Vasiljeva, O, Belvin, M, Richardson, J, Kavanaugh, WM, Desnoyers, LR.

Tumor-selective activation and downstream activity of CX-072 (pacmilimab), a masked Probody therapeutic targeting PD-L1, in PROCLAIM-CX-072: a first-in-human dose-finding study.

Boni V, Fidler MJ, Arkenau H-T, Spira A, Meric-Bernstam F, Uboha N, Sanborn RE, Sweis RF, LoRusso P, Nagasaka M, Garcia-Corbacho J, Jalal S, Harding JJ, Kim SK, Miedema IH, Vugts DJ, Huisman MC, Zwezerijnen GJC, van Dongen GA, Willemien Menke van der Houven van Oord C, Wang S, Dang T, Zein IA, Olga Vasiljeva O, **Lyman SK**, Paton V, Hannah A, Liu JF.

Praluzatamab ravtansine, a CD166- targeting antibody-drug conjugate, in patients with advanced solid tumors: an open-label phase 1/2 trial. 2021. *Clin Canc Res* 28:2020-2029.

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Model-Informed Drug Development of the Masked Anti-PD-L1 Antibody CX-072. 2021. *Clin Pharm. Ther.* (109): 383-393.

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Lysyl oxidase-like protein 2 (LOXL2) modulates barrier function in cholangiocytes in cholestasis. 2018. *J. Hep.* (69): 368-377.

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Selective allosteric inhibition of MMP9 is efficacious in preclinical models of ulcerative colitis and colorectal cancer. 2015. *PLOS ONE* (10): e0127063. **co-first authors

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Serum lysyl oxidase-like 2 levels and idiopathic pulmonary fibrosis disease progression. 2014. Eur. Respir. J. (43): 1430-1438.

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A bioinformatics method identifies prominent off-targeted transcripts in RNAi screens. 2012. *Nature Methods* (9): 363-366.

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High-content, high-throughput analysis of cell cycle perturbations induced by the HSP90 inhibitor XL888. 2011. *PLOS ONE*(6): e17692.

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Multiplex GPCR assay in reverse transfection cell microarrays. 2004. *J. Biomol. Screen.* (9): 196-207.

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Activity of the Hsp70 chaperone complex–DnaK, DnaJ, and GrpE–in initiating phage lambda DNA replication by sequestering and releasing lambda P protein. 1992. *Proc. Natl. Acad. Sci.* (89): 12108-12111.

POSTERS:

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Intratumoral Activation and Phase 1/2 Clinical Activity of Praluzatamab Ravtansine (CX-2009), a Probody® Drug Conjugate (PDC) Targeting CD166. San Antonio Breast Cancer Symposium, San Antonio, 2021.

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Evidence of Intratumoral Localization, Activation, and Immunomodulatory Effect of CX-072, a PROBODY Therapeutic Targeting PD-L1, in a Phase 1/2 Trial. ASCO, virtual conference, 2020.

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Lysyl-oxidase-like 2 (LOXL2) protein is induced in human cholestatic liver disease and in animal models of cholangiopathies. 48th Annual Meeting: European Association for Study of the Liver, Amsterdam, 2013.

Chien J, Richards T, Gibson K, Zhang Q, Lindell K, Shao L, **Lyman S,** Adamkewicz J, Smith V, Kaminski N, O'Riordan T.

High baseline serum lysyl oxidase-like 2 (sLOXL2) levels are associated with higher risk for idiopathic pulmonary fibrosis (IPF) disease progression and mortality. American Thoracic Society International Conference, Philadelphia, 2013.

Chien J, Shao S, **Lyman S**, Adamkewicz J, Smith V, O'Riordan.T.

Elevated baseline serum lysyl oxidase 2 (LOXL2) levels are associated with higher risk for idiopathic pulmonary fibrosis disease progression. European Respiratory Society Annual Congress, Vienna, 2012.

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Serum Lysyl Oxidase-like 2 (LOXL2) Enzyme Levels Correlate with Fibrosis Stage at Baseline and with Reversibility of Fibrosis in Cirrhotic Patients with Chronic Hepatitis B after Treatment with Tenofovir Disoproxil Fumarate. American Association for the Study of Liver 63rd Annual Meeting, Boston, 2012.

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Utility of serum lysyl oxidase-like 2 (LOXL2) measurement for the non-invasive estimation of liver fibrosis in patients with chronic hepatitis C infection. American Association for the Study of Liver 62nd Annual Meeting, San Francisco, 2011.

EXHIBIT 13

Susan Lyman January 30, 2024 at 8:46 PM

Re: Add to PY fdbk for op

To: slyman@initialtx.com

Also tell him in course of fdbk that I strongly suspect - as do others - thst the new se our hire is to avoid having to deal with me

I also noted that my combined biotech abd oostfic experience is 3y above the advertised minimal experience of 20y for a senior director

This - and the fact that as I found our, Grace with 7.5y e Perrin e got AD - makes me think that I was under titled upon hiring

I'd like to discuss this as well since this is the appropriate time of year to reflect on title and pay

EXHIBIT 14

2023 Annual Review for Susan Lyman

Annual Review: Self Evaluation by Susan Lyman

Submitted by Susan Lyman on January 26, 2024

Signed off on February 8, 2024 by Susan Lyman

Annual Review

Please provide your self-evaluation as it pertains to your achievement of individual goals.

What goals were you able to accomplish in 2023?

Describe what you were able to accomplish in 2023.

(1) Team management / intra & inter team relationship building: (Q4 and ongoing)

Due: Dec 30, 2023 **100.00%**

d ne

Team building / eam cul ure (S eam)

o When s ar ed a Tx in Aug, i was after a period o signi ican change

The company had grown signi ican ly in he pas year, people had left he company (or, and or sraa and lsa was he 3rd o 3 managers ha hey'd had in 0 3 (Mohan, Peiwen, me)

o Also, wi hin a week o my arrival, here was he irs o several "personnel si ua ions", all ocused on people wi hin my eam

o orming a s rong working rela ionship wi h my direc and indirec repor s & colleagues is always an equal priori y wi h doing good science because believe that this is foundational to giving and receiving constructive feedback, whether it's about data or behaviors or whatever

o When started, specifically invested time to have 1x1 mtgs with all members of my team within the first 2 weeks:

asked everyone what their pain points were, and what their career development goals were and then in subsequent meetings, asked them what projects / exps they were doing

This "person first, then science" focus helped build the foundation of our relationships

believe this strong basis also helped with the "personnel situations" that happened from August to Dec (and beyond)

These in erpersonal dynamics in he eam were (s ill AR) all challenging,

bu was pleased ha wi hin jus a ew weeks o my s ar ing a Tx, mos o my eam members el com or able being very open wi h me, and describing heir candid ake on he si ua ions

did my bes o collec bo h he ac ual and emo ional in orma ion, and ransmi ed wha el was appropria e o PY and hen HR (including cases o re en ion risk ha were associa ed wi h he ongoing in erpersonal challenges)

There was no happy ending or all resolu ion o hese issues, and know he in erpersonal con lic is unresolved

but am glad that we at least were able to get back to (mostly) reasonably functional working relationships in my team

Everyone was able to give their take on events, to know that they were heard, and that feedback was given appropriately to multiple parties involved in the situation

o have given feedback on scientific and interpersonal areas (within and across teams & to LT) even when it is very uncomfortable to speak up (e.g. to senior leaders)

This includes helping to author a "letter of concern" for 2 individuals, and then co leading the meeting to deliver that feedback

This was par icularly challenging in he case o one individual, since her manager did no agree wi h he con en o he le er and did no agree o a end he mee ing

u her manager and have been able o main ain clear communica ions and a good rela ionship despi e our differences o opinion on his ma er

Team per ormance / da a quali y

o ound ha da a quali y / assay consis ency / bes prac ices research were unexpec ed "developmen areas" or par s o my eam e.g. how some people were doing TC, designing assays, vetting data.

Some issues were immediately evident to me, and some (e.g. the wildly variable TC practices) were brought to my attention by Sandy's determination to get to the bottom of an anomalous cell population in MV411 flow exps.

t became clear that some not unheard of, but also not preferred TC practices were being used by several people, and there was resistance to change

was already planning on starting up "SL team" mtgs to discuss data & methods and to give junior people and RAs a comfortable venue to practice presentation etc and TC was an obvious starting point

So the first topic tackled with the significant help of Sandy was the TC practices. presented a few mandates & the scientific backing for my request, and Sandy brought up numerous areas of contention and asked for feedback.

Everyone had a chance to speak up, and if there were TC practices that wasn't onboard with, everyone had a chance to present a scientifically / empirically backed up case to make an argument to use method 1 vs method 2

Through a series o several m gs, we came o a consensus (or a leas a "disagree bu commi ") on which TC prac ices was going o manda e, which ones we agreed as a group o change, and which ones were more lexible

We will be using he "S eam" m g going orward o address as a group issues o assay design & in erpre a ion, da a discussion, eamwork, and cul ure building

Career developmen / re en ion

o When s ar ed, had x m gs wi h all members o my eam and among he many opics o discussion was "wha do you like / dislike doing" as well career goals / career dev one of the big pain points was the routine SAR assays

o Prior to my arrival, lsa's group was seen primarily as the "screening" team and Esraa's group as the PD team

felt (as did PY) that everyone should be able to do both screening and MOA work so swapped some responsibliities with the goal that everyone on both teams would eventually be both some routine assays and some MOA/PD work

lsa in particular has really blossomed in this past quarter (vs. the first half of the year, based on input received on prior perceptions of her performance)

al hough all o he skills and abili ies she is now showing were always here, she is now consis en ly per orming a a high level

hink she eels much more con iden now and is doing very well managing her eam

sraa (per he mid year review) was very produc ive in H 0 3, bu has had a challenging Q4 due o some complex personnel issues

However, she and her eam did a ine job o delivering da a (PD or myc, mul iple exps or AR)

sraa's eam as a whole had produc ivi y challenges in Q4 due in large par o he personnel complexi y men ioned above bu hink we are making progress, and having candid discussions abou issues

o 've also set up quarterly check ins with my direct reports and monthly skip levels, to make sure that there's a scheduled time for mutual feedback, career dev discussions, suggestions for team / company culture, etc

nter team relationship building:

o 've gotten feedback from my team that the 2 groups (K EM) often don't really know what the other is doing, and that they also don't necessarily feel that they know what FW's team is doing

To try to address this, started the "SL team" mtg (see above) to have a venue to informally share data & info on a biweekly basis

am also alking o he in he renches olks in bio o see i hey hink an in ormal "op ional" m g x a mon h o discuss PD/MOA da a in order o genera e ac ionable hypo heses & exps (which we would hen bring o he T) would be use ul

So ar almos all o he people 've alked o are in eres ed and en husias ic abou rying his

have go en approval rom PY and PP o ry his ou , so we will have a ew rial mee ings in eb / March i 's no use ul, we will ax he mee ing

Company cul ure building

o Probably the single most discussed topic in the 5 months 've been here as been company culture and communication (around science and in general) both top down and sideways

Some of the people who talked to me were comfortable speaking up themselves; some weren't

Since am comfortable bringing up suggestions and solutions, have been vocal hope in a constructive and professional way about issues that people see (both cultural and scientific), and suggestions from the trenches for improvements

agree with Heather from the "productive team member" training that having multiple people speak up in a public forum was a

pivotal moment in cultural growth: airing and discussing things people see as problems

and others are looking forward to engaging with our peers and with the LT on how to identify Tx core values, and how to help put them into action

(2) Design & execute (SL team) combination strategy / studies for potential "c myc" program indications (Q4 and ongoing)

Due: Dec 30, 2023 **100.00%**

d ne

Combo

o researched AM rea men paradigms & SOC agen s, and crea ed a priori i ed lis or our inves iga ion

o researched combo paradigms and associa ed li era ure, and also learned abou he impor an principle o "independen ac ion"

i.e. that most purported "combo" activity in clinical trials actually does NOT depend on the simultaneous presence of 2 agents, but just on having 2 agents that target different clonal populations in the tumor.

This could be very impactful to clinical design, in allowing us to (potentially) combine 2 agents with similar tox, but to let one agent wash out before treating sequentially with the 2nd agent

o also identified several free online additive/synergy analysis programs (not limited to academia, as was the case for most of them) and also discussed with Fred, who found an additional open source Python script collection

o Isa was very interested in taking this project on, and thought it would be a great chance for her to show leadership

or he ime being, have done mos o li diving, because her lab work demands make i difficul or her o do all o he we lab as well as subs an ial li diving

have been discussing wi h Isa areas where she could delega e, or where we could po en ially rans er some o her we lab ou side he group so she has more ime or s ra egy

o We have no ye reached he s age o in vivo combo, bu 'd advoca ed or he Champions AM ex vivo s udy or a while i is a grea op ion or combo (pending single agen ac ivi y); 'm happy ha we are now doing i

've made an argumen ha (in ligh o swi ching he ocus o T3 w lines) we should s ill (lower priori y) look a TCs wi h T3i lines, because the relapsed/refractory population will include FLT3 mutants, whether de novo or treatment acquired

am happy to have Jeff here so can benefit & learn from his in vivo experience & discuss model selection, combo agents, & treatment paradigms

(3) late Q4 to 2024 Generate, characterize, & utilize ITC resistant cell lines in key indication(s) (dual goal for combo strategy & biomarker discovery):

Due: Dec 30, 2023 **15.00%**

d ne

Resis an lines

o Mariwil/ sraa have genera ed a 936 resis an MV 4 line wice (s did no recover well rom ro en s ock), and ried o ex rac RNA or RNASeq analysis

However, to date the RNA quality and quantity has not been sufficient for RNASeq per PY, this effort has been discontinued until we choose our top 2 pre DC TCs

We have not used that line in any experiments yet, pending finding any promising combo chemo with TCs

o Mariwil/Esraa are generating gilteritinib (FLT3i) resistant MOLM 13 and MV 4 11 ETA late March 2024

o have proposed using FLT3 wt lines with top 2 pre DC cpds to generate more potentially relevant variants

(4) Biomarker discovery PD & predictive (see also resistant line generation)

Due: Dec 30, 2023 **85.00%**

d ne

iomarker discovery

o worked closely wi h Grace and am now working wi h Jeff/Colin o s ay upda ed on in vivo plans, and o give inpu especially on PD s udies (or oppor uni ies or PD overage s udies)

advoca ed (wi h Grace, early on) or using overage mice when possible / appropria e or explora ory PD (U 3 7 h, OC AM 4h, and began a nego ia ion wi h Crown or overage discoun s

o My eam and delivered assays and da a on s ringen imelines or he irs PD cen ric s udy, U 3

We were able to triage proposed markers and identify new potential markers (via our lit searches, input from FW team and LT)

prioritized those that seemed promising and potentially MOA relevant, and in some cases we did a quick & dirty assessment of those that seemed less relevant, or that did not have good detection reagents

Isa showed the first PK/PD relationship, with p21 in MV 4 11 (10, 30, 100 mpk). Esraa also ran p21 by CE , but the dose relationship wasn't as clear, possibly due to differences in assay range

o For subsequent PD studies (22RV1, OC AML 2, the large 132 mouse U2401 study) have coordinated tasks and responsibilities between the K and EM groups

've kep my eam in ormed o imelines or sample arrival and expec a ions or da a deliverables

have also pushed back when needed on expec a ions ha couldn' realis ically be me , even wi h eam members sharing work and early / la e shifts (e g or C)

o have proposed using mul iplex analy e pla orms (e g Soma ogic, R M) and phospho pro eomics (CST PTMScan)

o bu am wai ing or a more op imal sample se o make a ormal proposal (e g U 04 mul iple dose levels, 4h / 4h imep s)

n he in erim, have ga hered in o or pricing and imelines or hese biomarker D approaches, and will pu oge her a ormal slide proposal or each me hod in eb 0 4

Finding clinically actionable circulating biomarkers will be critical (MO) for clinician support and patient enrollment

f biopsies (or for AML, bone marrow collection) are our only route to seeing PD, this will likely significantly slow patient recruitment and adversely impact runway & timelines

f we can find robust circulating biomarker(s) in CLX models and replicate the finding in higher bar models (PDO, PDX), it could have significant impact on our clinical trial design and our ability to see what TCs are doing in humans

(5) Support lead discovery / SAR / DC identification, assay development for MOA mapping (c myc program & others)

Due: Dec 30, 2023 100.00%

d ne

SAR / MOA mapping

o When s ar ed a Tx in Augus , here was more variabili y han was desirable wi h he CTG and Alpha isa assays or SAR

My irs goal on he job was o work wi h lsa o ind ou he cause(s) o he variabili y and ensure ha chemis ry ound he da a use ul or SAR

We made some minor changes o he pro ocols, bu he bigges change (and bigges impac) was rom

( ) changing he replica e s ra egy rom n on 3 pla es o n 3 on pla e

(2) using the D300e compound dispenser which lsa had been told not to use by an earlier manager, otherwise the data likely would have been tighter much earlier

(3) likely, but not proven: making our own stock from powder in house, vs. using the NJ CRO to make plates which had more than once given different results vs. in house stock

With these changes, the data become much more consistent making life better for everyone!

o The data delivery deadlines (published within 1 week of assay completion) had been difficult to meet prior to the changes above, since the assay data was more variable

Some imes TCs would need o be repea ed mul iple imes in order o iden i y he "canonical" value range ha would be sui able or da a publica ion

However, after he changes, da a was rou inely published on ime his was in par because

( ) Dani had become adep a handling "bo h" weekly assay runs, reeing up some o lsa's ime or more rapid QC'ing and publishing o he da a

( ) The decreased variabili y lessened he need o do mul iple re runs o TCs, so da a could be published after n or occasionally 3 runs, vs n 4 runs

o The "develop assays for MOA mapping" goal has significant overlap with the "biomarker discovery" goal, but will focus on the assay part:

n looking for alternatives to the pain in the neck c myc AlphaL SA, we identified and tested several options

Abs for possible in house EL SA development using MSD or the SMCxPRO ultrasensitive bead based EL SA platform

2 commercial EL SAs,
ac iva ed c myc DNA binding assay ki
an based approach o de ec ing nuclear myc (under developmen by Dani)

also go c myc da a rom DepMap or RNA, copy number, and pro eomics analysis o see i here were o her cell lines o in eres ha would have higher c myc / easier de ec ion

ound ha MV 4 da a largely predic ed lower levels o myc, while he NSC C line H460 (an indica ion o po en ial in eres) was likely in he higher range

We ried es ing H460 in he Alpha isa (and o her al erna ive) assays, bu he signal was no appreciably be er and here was a lo o his orical da a or MV4 so we s uck wi h i

Sandy has brought the use of the ncucyte (9Sq's instrument) in house, and it has proved to be extremely useful in characterizing growth curves as well as for cell death assays

Recent incucyte data showed an unexpected and somewhat mystifying TC dose dependent inhibition of casp3/7 cleavage, which is suggesting a senescence MOA

Esraa's team has developed p21 immunofluorescence assays, and lsa identified and tested multiple p21 EL SA kits and with the best kit, showed our first in vivo PK/PD relationship in mouse PD samples

Mariwil developed a multi analyte cell cycle assay, and Sandy took another approach and used a DNA + p HH3 cell cycle assay

These 2 approaches both suggested accumulation of TC treated cells at 2n DNA, G0 and/or G1

This data was important in that it was consistent with the upregulation of p21, but also led to further Qs: is it G0/senescence or G1/cell cycle arrest that we're seeing? How is it all related to SR?

We are abou o es (Q 0 4) a ew arge ed senescence assays o ry o pin down he MOA

(6) New target selection –

Due: N/A **100.00%**

d ne

New arge selec ion

- Little activity on this goal from Aug Dec 2023 other than participating in new target meetings and in the Dec 2023 PY LT meeting in which we did the initial triage of the target list

(7) Personal / professional development: (Q4 to forever...)

Due: Dec 30, 2023 **100.00%**

d ne

"Smar brevi y"

o As a very de ail orien ed person, i has always been a challenge o keep hings very high level, because ha is no how my brain works

o have received eedback rom PY / PP o ry o make my emails and upda es shor er (also my on larger and darker, which did) and o no provide con ex ual in orma ion unless reques ed

Trying o be proac ive abou his, (and knowing he difference in our s yles) had asked PY a couple o imes early on abou whe her she wan ed a brie able orm upda e vs my longer bulle poin s yle

in Nov she told me that yes, she would prefer that. appreciate the latitude got from Aug to Nov!

have switched to this style, though am still adapting to not including too much context and detail

my last report was within the 2 2.5 pages that PY's other direct report FW usually does, so feel like am in the ballpark

o have been working on this detail vs. big picture balance for my entire career, and it remains difficult for me, because of my thinking style

o However, believe that overall have made good progress towards this, with intermittent lapses

Challenging personnel si ua ions

o There is a lo o in erpersonal rela ionship his ory here a Tx, and some o i has been pain ul and coun erproduc ive

o The ensions are primarily be ween and wi hin individuals who are all in my group

o As men ioned in he "managemen " sec ion (and as has been documen ed ex ensively elsewhere) here were a number o inciden s Aug Dec ha led o very difficul si ua ions

o t is not surprising that these tensions have also affected how am viewed, and received feedback in mid Jan 2024 that was perceived as favoring one person in the group

have provided details and information that supports my belief that do not think this is the case and am happy to further demonstrate or discuss this with the LT and anyone on my team

mmediately upon receiving the feedback, spoke extensively with both of my direct reports and with the perceived "favorite" individual to discuss the feedback

o was not provided with any examples that related to any specific concrete instance in which showed favoritism

o bu he direc repor who spoke o me gave mul iple ins ances where he " avori e" individual in ques ion was perceived o be ac ing wi h special au hori y or approval rom me

am rying o see his hrough he eyes o hose who provided he eedback, bu eel ha have done (and will con inue o do) he ollowing

n eam mee ings and in email discussion, have been very proac ive abou asking or inpu and commen s rom everyone

am deligh ed o le anyone who s eps up o lead or o volun eer o do ha There is no special s a us required

am equally scientifically critical of everyone in the group, and hold up the same standards of scientific rigor

am here from ~8AM ish to 8PM ish, plus or minus so am available for comment or discussion (or just chatting) with both the earlier to arrive, earlier to leave crowd and the later crowd

chose to sit in the cubicles especially so that could be available to anyone who wanted to interact with me and have told my team am here anytime for Qs or discussion

feel that am very approachable as of a few weeks ago, (prior to the feedback) had set up regular skip level meetings to ensure everyone had a scheduled chance to speak with me

told the team that the topic of our 30 min was 100% up to them! Didn't have to be data, could be feedback for me or others, career dev discussion, suggestions about anything

hope that everyone on my team feels like they can approach me to discuss anything, big or small

u regardless o wha he empirical ac s are, he percep ion ha have a avori e is s ill some hing ha ake very seriously and am being very mind ul o no jus wha my in en ions are, bu wha o hers' percep ion is

New areas o learning (ribo biology, SR, AM , small molecule P) & new hire orien a ion

o No de ail needed here am reading a lo abou various opics ha are largely new o me, and making progress in crea ing a knowledge ramework in hese areas

o / when have any new repor s, will priori i e making a very clear in ro package or hem ha con ains he basics abou he echnology (drawing rom W eam) and abou he MOA, speci ic biology or a given program e c

o No time to do this now, so do not plan to prioritize it ASAP but this is something that think would have been very helpful in the past

o know that Phil has said he would also like to create an onboarding "package" in which functional leaders maintain an updated Ppt of the "greatest hits" highlights of their team's work

(8) Ensure maintenance of a safe laboratory environment by actively monitoring and contributing to a culture of safety in which all scientific staff are accountable

Due: Dec 30, 2023 **100.00%**

d ne

Sa e y

o Tx's lab manager (Mariwil) is in my group, and she keeps many routine lab items running smoothly, so that the other lab folk have ready access to properly labeled waste bins, correctly stored acids / solvents, etc.

o We all appreciate Mariwil's work in keeping the lab safe

o also have a former lab manager (Sandy) on the team, and she has also volunteered to help contribute to the lab tasks and is currently managing lsa's teams TC room while Mariwil manages the EM/FW team's TC room

think this is a great division of labor, and shows how we can all work together effectively to benefit the whole bio group

Were there any challenges in achieving your goals?

What action can you take to continue your professional growth?

think have covered the "challenges" in my self eval for individual goals, so will spare Peiwen having to read more text!

Probably the most impactful things can do here at Tx to continue my professional growth are:

(1) Continue to work on big picture view in thinking and in communication (difficult but achievable for my brain style) and in interacting effectively with those who have different scientific and personal styles

( ) Use he ex remely difficul imes in my irs ew mon hs (new job, new biology, small molecule SAR, many personnel challenges, hours spen having necessary bu exhaus ing conversa ions, hours and la e nigh s spen documen ing)

and he sunami o his orical Tx cul ure / in erpersonal knowledge ha gained rom ha period o help he Tx cul ure evolve in o some hing heal hier and more produc ive by being vocal and cons ruc ive in speaking up abou bo h issues and possible solu ions

(3) Try o ge as many oppor uni ies as can o learn abou and par icipa e in small molecule clinical planning (including o course clinical biomarker s ra egy, bo h PD and predic ive) o enrich my experience

have la e preclinical and clinical biomarker experience in biologics, bu small molecules are a differen beas al oge her,

and really hope that can be involved in (or at least learn about post hoc, from mtg minutes etc) the clinical strategy meetings and also to have regular interactions with Mo and other clinical ATP / consultant people

Please rate your goal progress over the previous period.

Exceeded Expectations

Review Signoffs

Susan Lyman

Signed off on February 8, 2024

Annual Review: Manager Feedback by Peiwen Yu

Submitted by Peiwen Yu on February 23, 2024

Signed off on February 27, 2024 by Peiwen Yu

Signed off on February 28, 2024 by Susan Lyman

Manager Review

Please provide feedback on employee performance as it pertains to goal achievement and professional growth.

Overall what is your assessment of this employee's goal accomplishments over the last review period.

Provide a narrative summary of the employee's overall performance.

Susan has been repor ed o me since she joined ni ial in Augus 0 3 Susan is care ul and en husias ic abou science wi h a hear or a very de ail orien ed approach o providing broad in orma ion on he projec s and asks she worked wi h or example, she presen ed a good in roduc ion on AM landscape a he c Myc core mee ing She ensures her eams are upda ed wi h mee ing summaries rom c Myc core eam and RRC mee ings are commendable n addi ion, she did a grea job o supervising sa's lab skills by providing valuable echnical advice and ensuring he high quali y o da a genera ed by her eams or example, Susan encouraged and augh Isa's eam how o use an au oma ed compound dispenser o se up one o he cellular assays and his had he desired effec o igh ening up he error bars in he assay Susan is also con iden in issuing directives when conflicts or critical matters arise. She is also mindful of career development opportunities for her team.

One of her strengths was not afraid to voice her and others' opinions, ask key questions, and raise disagreements to open discussion in public settings. She also is very proactive on environmental matters such as air purifiers for conference rooms, space rearrangement, and topics related to benefits.

Susan exhibits strength in her evident passion for science, attention to technical detail, and desire to support scientists in her reporting line.

Discuss the employee's readiness to progress in their career.

Provide guidance in what the employee should focus on over the next 6-12 months.

Susan's well intentioned approach of being highly detail oriented in communication with her emails and weekly updates may sometimes have the unintended consequence of limiting her effectiveness in her senior role as a Director for the reasons described below (Write Less, Say More). The inclusion of unneeded levels of detail sometimes has the consequence of the well intentioned message not ever getting heard and understood and sometimes being frustrating to the recipient of the long message. Sometimes Susan gets caught up in perfecting details and too 'down' on our science and orge s ha a company o his si e needs o survive on imely deliverables and courageous decisions ha mus often be made "a risk" in he ace o incomple e in orma ion especially in he unding clima e and imelines o oday

s rongly recommend he ollowing areas or Susan o work on n addi ion, encourage her o be more delivery ocused wi h a "can do" spiri on high priori y reques s, balance be ween de ail vs ocus in a sense o urgency, deliver a concise presen a ion, cap ure key messages, and ocus on priori ies or her assignmen s

Wri e less, say more

Susan has a endency, based on my experience wi h her emails, weekly upda es, and slide presen a ions, o provide in orma ion ha is longer and more de ailed han is appropria e or he si ua ion While apprecia e he spiri o where she is coming rom he provision o de ailed explana ions o her hinking and ra ionale, here is an unin ended impor an nega ive consequence o leng hy communica ions i requires he recipient to often spend an inappropriate amount of time reading, understanding, reflecting upon and the responding to the communication. Susan will be more effective if she can learn to boil down her written communication to key points.

2. Deliver what you commit to ON T ME.

'd suggest Susan be more accountable for her deadlines. t is much, much better to deliver a work product on time, with known imperfections, than to deliver a more perfect work product late especially for those in senior roles as Director. Delivering an imperfect work product on time shows accountability and provides the opportunity for feedback from one's manager as to whether a "more perfect" work product is needed. f more detail is needed, the supervisor can follow up and give guidance re what is needed and when. This often saves time on both sides of the manager report equation and it can build trust because of the accountability and respect demonstrated by delivering on time.

3. Work proactively to clarify what has been communicated and agreed to.

have asked Susan to follow up with a SHORT email summarizing what she understood that she agreed to do after our 1x1 meetings. This will be useful for me to ensure that she accurately understood my intended message and well received the requests. A short email synopsis will also provides her an oppor uni y o clari y any hing ha she migh have misunders ood in he mee ing and will give bo h Susan and me a clear unders anding wha has been agreed o in erms o bo h scope o work and imelines

4 rom my perspec ive and collec ed eedback i Susan can be more lexible and open minded o adjus her working and communica ion s yles o i our organi a ion, she will be a more success ul and impac ul employee look orward o par nering wi h Susan on his

Speci ic eedback received on Susan's leadership

On some non scien i ic i ems, Susan seems o persis en ly pursue her sugges ed changes par icularly in he public se ing after he company's inal decision and announcemen , his has been recogni ed as no appropria e (original word no accep able) or her level as a Direc or She is expec ed o work in alignmen wi h he execu ive T eam and lead by example in deploying he company policies and messages A recen example is he aiser insurance issue

Rate the overall performance of this employee.

ully mee s expec a ions

Review Signoffs

Peiwen Yu

Signed off on February 27, 2024

"Peiwen Yu"

Susan Lyman

Signed off on February 28, 2024

EXHIBIT 15

Gmail SK L <sklyman@gmail.com>

FW: 2024 Comp letter

1 message

Susan Lyman <slyman@initialtx.com> Mon, Feb 26, 2024 at 4:05 PM
To: Susan Lyman <sklyman@gmail.com>

Rating was MEETS. I discussed with PY on 2.26 that I felt I did not receive timely feedback or specific examples of dev areas – the only one provided was actually from 2024, not 2023.

She said it was 360 fdbk – it wasn't hers to give (I think this is at least partly false)

I said that everyone had a responsibility to give timely feedback – and that I felt that anything that merited 3 pages of text should have merited a 10 minute conversation within a few days of whatever precipitating event. She said that's not realistic. I disagreed.

I got the baseline 3.5% increase, but it was prorated to the 4.5 months I worked in 2023, so worked out to only $3k ☹

From: Peiwen Yu <pyu@initialtx.com>
Sent: Monday, February 26, 2024 11:15 AM
To: Susan Lyman <slyman@initialtx.com>
Subject: 2024 Comp letter
Importance: High

Hi Susan,

Per HR's guidance, I am emailing you the attached comp memo which includes the merit increase, bonus, and equity grant effective Jan 1, 2024.

Thank you for your contributions and dedication to Initial, please let me know if you have any questions about this memo.

We look forward to your continued contribution in 2024.

Peiwen

2024.22.02_Lyman._S_2024_Comp_Letter.docx.pdf
388K

EXHIBIT 16

Francesco Caiazza 3/19/24

...my part Asked why it had to be implemented when Exec Dir clearly told me he didn't have some of my expertise He is heavy assay dev Has no in vivo or PD or biomarker I Suggested they at le

Asked why it had to be implemented when Exec Dir clearly told me he didn't have some of my expertise

He is heavy assay dev
Has no in vivo or PD or biomarker

I Suggested they at least wait 4 months

Reconsider

Then if still a go, announce it snd make a transition to fully divest my team next year

I Was told no

It will happen and be announced in mtg tomorrow

EXHIBIT 17

Pre team D 55
told me PP remarked
to her that I worked
extra hard was
here when he got sent
here when he left

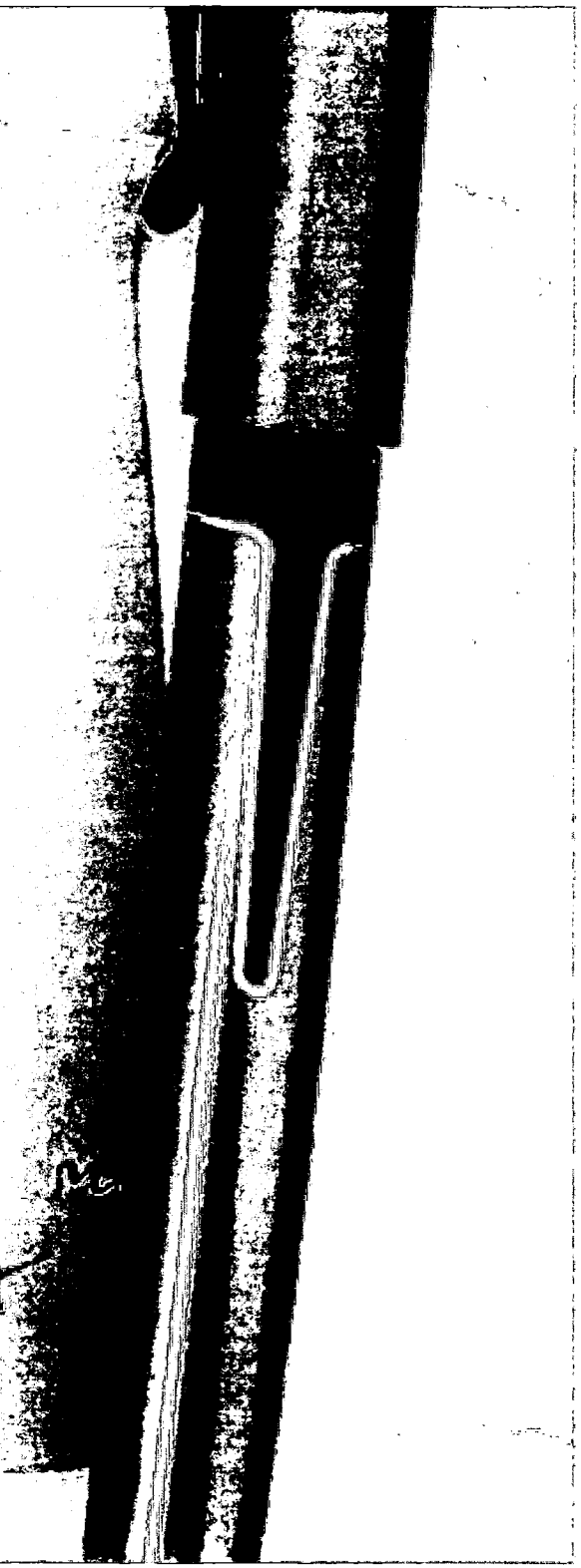


EXHIBIT 18

Susan Lyman

Sent - iCloud March 18, 2024 at 9:55 PM

Re: E talk

To: slyman@initialtx.com

When I asked PP
Why did no one ask me about this beforehand?? Or even give me the courtesy of a short alwrt before the full in HR mtg??

He said he understood and he had been in a very similar position where his team was taken away from him but in this case people who k re and had been strictly warmed not to tell him face him an alert bc they felt it was unfair for him to be broadsided

He says that hade him time to process and get through the strong acute emotion and he appreciated it

Yet he didn't see fit to hade the same courtesy extended to me???

EXHIBIT 19

Outlook

Re: Follow up

From Sandy Spurlock <sspurlock@initialtx.com>
Date Wed 3/20/2024 6:08 PM
To Phil Patten <ppatten@initialtx.com>

Thank you Phil. I appreciate the response. I have worked in several biotech companies and this was a first for me. I have also never seen a Director and Sr. Principal Scientist be considered equal. Or had someone lose their entire group of six without it being a demotion due to poor performance. I guess Initial is just very different from anywhere else I have worked.

I shared my perspective and feelings with you because I was both disappointed in the way the meeting went and because I was appalled by Jackie's handling of the title change. It was beyond unprofessional and felt like a public shaming. I feel sick when I think about it.

In regards to the paragraph about retaliation, maybe that's not what it was but it's what it felt like. A punishment or disciplinary action that was taking place for all of us to witness. That may not have been your intention and, if Jackie hadn't handled the change in title the way she did, it may not have seemed that way. But it was horrible. Eric even looked like he was going to cry. It was that bad.
At this point, I don't think this is something I want to talk more about. I can't see much use in meeting. We can't reverse what happened and the company has clearly made up its mind on the issue. I just wanted you to know what it felt like for us so maybe situations like this can be handled differently in the future. I also feel obligated to be honest with you.

Happy to chat anytime about science or good food, though. Thanks again for reading the email.

~Sandy

Get Outlook for iOS

From: Phil Patten <ppatten@initialtx.com>
Sent: Wednesday, March 20, 2024 5:46:59 PM
To: Sandy Spurlock <sspurlock@initialtx.com>
Subject: Follow up

Hi Sandy,

Good feedback – thanks.

We gave a lot of mindful thought regarding how to approach this. Did my level best to take into account the reactions and feelings of all parties. I am saddened to hear that the meeting did not go well.

Re the role change, we were very mindful and intentional to make sure this was a lateral change in terms of level and compensation. The big material difference is a change from having two direct reports and a group of 6 to being an Individual Contributor with no direct reports. We put a lot of thought into aligning her role her states desires as areas of growth (biomarkers) and company needs (hugely

important for the c-MYC program). I acknowledge that this is a big change – I have experienced similar things. I specifically discussed the reporting structure change at length with Susan yesterday and entertained her arguments to keep some direct reports. I made a carefully considered decision to support the recommended reporting structure change. Can say more about that if interested.

Regarding your third paragraph, I'd like to better understand your points before responding. I can assure you that there is no element of retaliation, from my perspective.

Please drop by to chat at your convenience. I am available tomorrow at the following times – feel free to schedule time in those windows.

- 9 - 10:30
- Noon – 2
- >3:15

-Phil

Phillip A. Patten, Ph.D.
Chief Scientific Officer
Initial Therapeutics
285 East Grand Avenue, Suite 2200
South San Francisco, CA 94080
650-391-6616 - mobile

From: Sandy Spurlock <sspurlock@initialtx.com>
Date: Wednesday, March 20, 2024 at 4:29 PM
To: Phil Patten <ppatten@initialtx.com>
Subject: Org Changes

Hi Phil,

I'm sure you are prepared to be getting some feedback re: org changes. I was very open in the meeting we just had and I hope the information will get passed along to you. In addition, I just wanted to say two things. First, that was the most uncomfortable meeting I have ever attended in my entire professional career. Having that information announced to everyone all at once with no time to absorb it prior to meeting with the group was bad enough. But having to sit there and give feedback- feeling terrible for Susan because of what was happening while at the same time feeling terrible for Eric because he's a really nice guy and it's not his fault- was horrendous. I hope that, in the future, the company can take into consideration the feelings of the employees who will be affected by this type of change. I can say that, even at large companies, I have never felt so insignificant.

The second thing I want to point out is that Susan realized in the meeting that her title had changed. When Jackie was pointedly asked for clarification as to why this happened (first by Susan, then by Ilsa, then by me) she finally answered and said "that information was on the slide yesterday and that's all I'm going to say about that" Indicating that Susan should have known because the info was a slide she was being presented while finding out she was losing her entire group. I am shocked that our HR department thinks that is an acceptable way to present a title change to someone, especially when it is clearly a demotion. I don't know who Jackie is accountable to, but someone should tell her she should know better. It was not only a heartless and unprofessional way to handle the situation, but she could have opened this company up to litigation. Demotions need to be handled in a very specific way, and that is not it.

I have been honest with you in every conversation we have had, Phil. One of the things I told you I feared was that Susan would suffer the back lash of the interpersonal issues that were happening. Despite her efforts at supporting everyone and trying to pull the team together, there were forces involved who didn't want things to get better. Sadly, it seems that my fears were right. Because she did a great job directing us, pushing science forward, fostering collaboration with Fred's group (who is somehow the only group that is never affected) and making us care about our research. As far as directors go, she has been top notch. With her guidance, I have felt at my best as a researcher, which is what I would think the company would want. I couldn't also help but notice that the people who caused the majority of the issues and drama were also unaffected by any of this. to be honest, it just feels very retaliatory.

Just my two cents.

Best,

Sandy

EXHIBIT 20

initial

Cellular Biology Meeting

March 20, 2024

Goals for the Cellular Biology Team

- Optimize the assay process
  - Weekly screening
  - Tumor sample screening
- Increase capacity and decrease timeline
  - Technologies that are higher throughput
  - Strong collaboration across groups
- Improve the culture
  - Focus on Science
  - Conduct
  - Communication

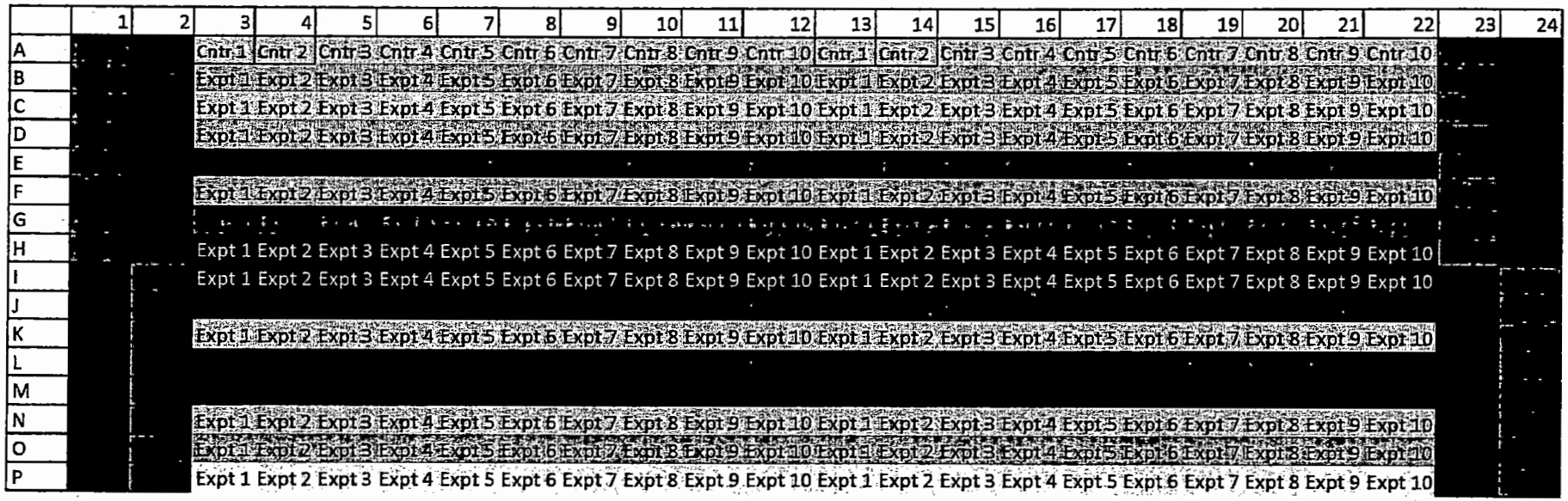


Expectations for Assays

- Must have a written Standard Operating Procedure
- Must pass plate uniformity test and Z' requirements > 0.4
- Strong preference for 384-well plate format
- Strong preference for automation where possible
- Strong preference for a standard plate map



My suggested plate map 384-well plates



- Single concentration Positive control (100% Inhibition)
- Single concentration Negative control (0% Inhibition)
- Dose titration of positive control (10 points) 1:3 dilution

15 Test compounds
10 point titrations
In duplicate
+ Control titration in duplicate
+ High/ Low Controls for Z'

Plans for expanded workforce

- FTEs
  - Senior Scientist
    - Project representative/ leadership
  - Associate Scientist
    - Assay development support

- Contractors
  - Shared flexible workforce
    - Requires request and approval
  - Execution of:
    - Weekly screening
    - Tumor sample studies
    - Cell culture
    - Other work as approved



Built for Success: Initial Cellular Biology Organization 2024

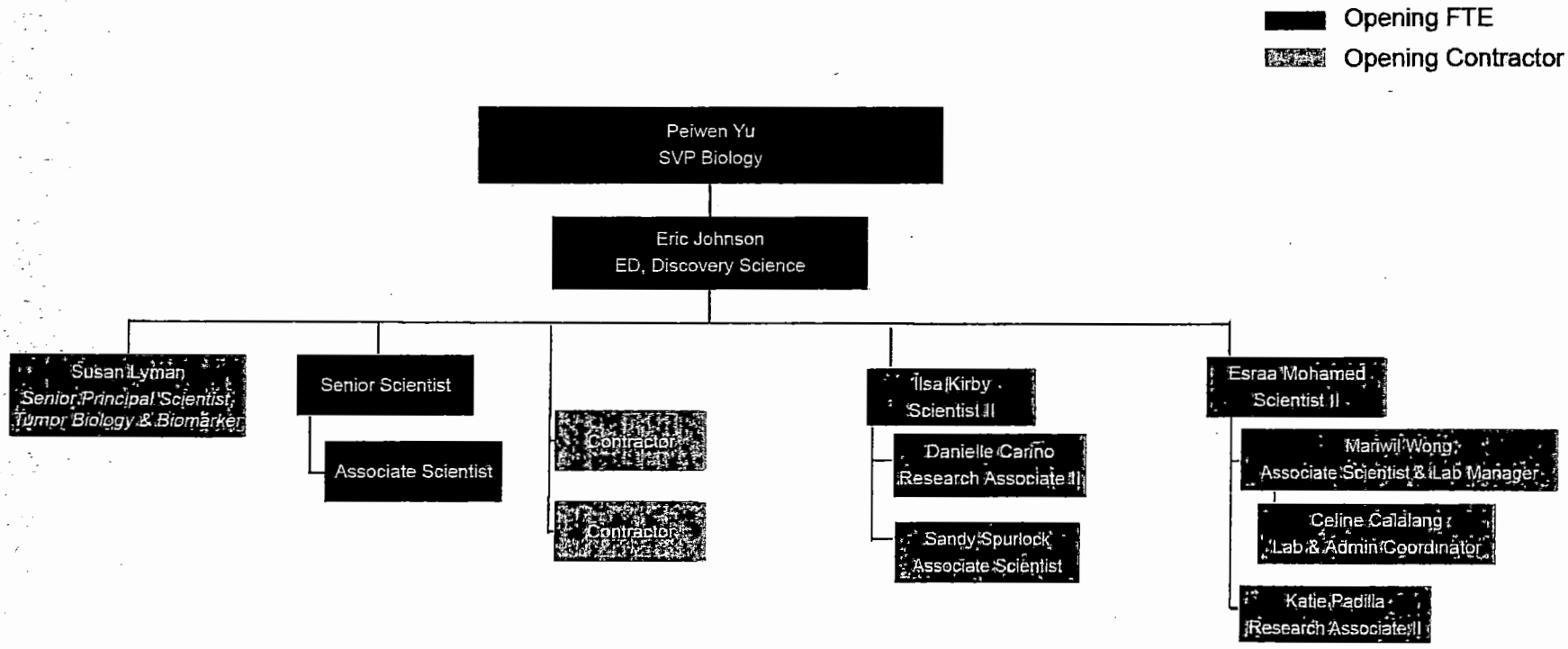
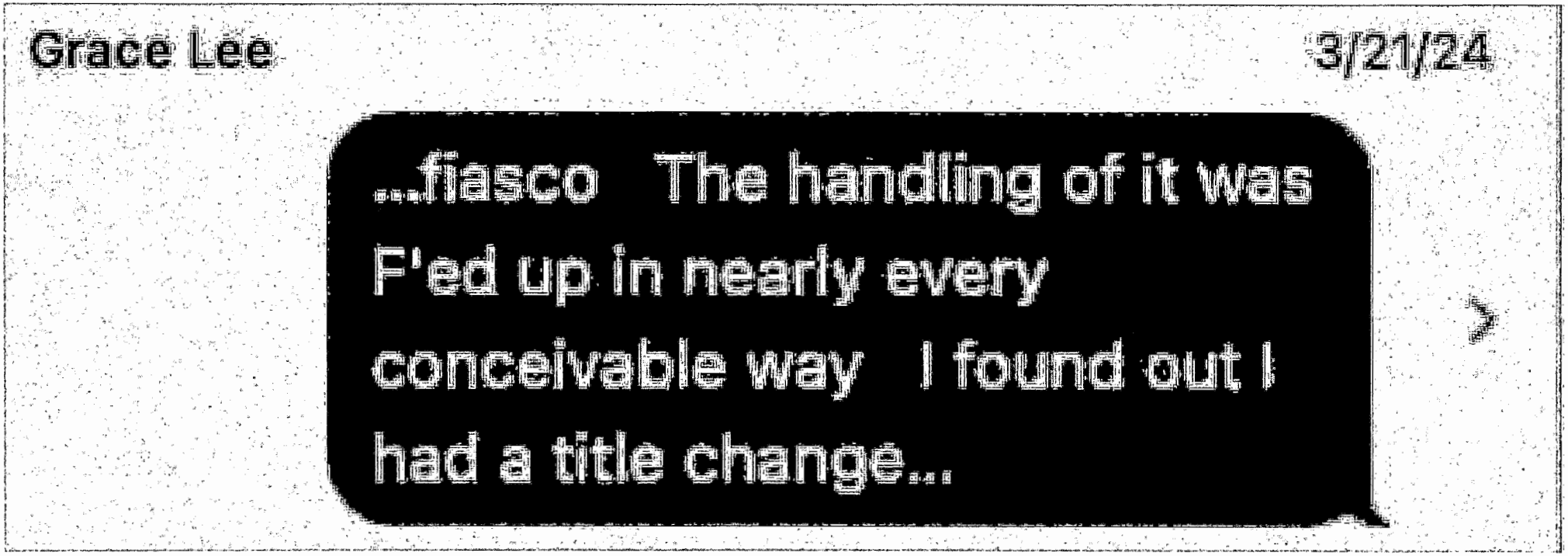


EXHIBIT 21


Grace Lee
3/21/24
...fiasco The handling of it was F'ed up in nearly every conceivable way I found out I had a title change...

Major fiasco

The handling of it was F'ed up in nearly every conceivable way

I found out I had a title change and had been moved to the non- management track

IN THE MTG

In real time

I protested

As did 2 of my team

EXHIBIT 22

Outlook

RE: mystery fun mtg - reschedule?

From Susan Lyman <slyman@initialtx.com>
Date Wed 3/20/2024 4:07 PM
To Esraa Mohamed <emohamed@initialtx.com>; Ilsa Kirby <ikirby@initialtx.com>; Mariwil Wong <mwong@initialtx.com>; Katie Padilla <kpadilla@initialtx.com>; Dani Carino <dcarino@initialtx.com>; Sandy Spurlock <sspurlock@initialtx.com>

Hey everybody,

Please let me know if you'd like to talk after the reorg reveal we just had – I am here to discuss the change, my impressions of Eric (positive) or anything else.

Grab me or send me a mtg invite if you'd like to chat :)

We will STILL have the fun meeting! But that will be our last team meeting, unless Eric wants to have a team mtg (I assume without me) in that slot.

Esraa and Ilsa, I will keep 1x1s for us on the calendar for this Thur (IK) and next Mon (EM) if you want them – optional, and I won't be offended if you'd just like the time back on your calendar!

Thanks to the couple of fun mtg responses - since Dani is OOO this Friday, I've revised the options below.
I hope one of them works for everyone!

And though I really think Eric is a very nice person and will be an excellent manager who you can learn a lot from (and who will support your career development), I am truly sorry to not be working directly with all of you in a group structure anymore 😿

I enjoy everyone's diverse backgrounds, unique personalities (and unique pets!) and I have learned a lot in the 7 months we were team CAT 😺

	Please write good / bad / medium times (and/or choose a specific interval e.g. 10:30-11:30)
Tues (26th) next week sometime in **10-1** slot (OK to eat lunch during fun activity!)	
Fri next week (29th) sometime in **10-12** slot	
Fri next week (29th) sometime in **12 – 2** slot (OK to eat lunch during fun activity!)	

From: Susan Lyman
Sent: Tuesday, March 19, 2024 6:35 PM
To: Esraa Mohamed <emohamed@initialtx.com>; Ilsa Kirby <ikirby@initialtx.com>; Mariwil Wong <mwong@initialtx.com>; Katie Padilla <kpadilla@initialtx.com>; Dani Carino <dcarino@initialtx.com>; Sandy Spurlock <sspurlock@initialtx.com>
Subject: mystery fun mtg - reschedule?

Since the equally mysterious "cell biology organization" meeting is now interfering with our mystery (to everyone but me!) fun time, I'd like to find a time to reschedule.

I know folks are busy with the PD rush and the usual rush, but would Fri AM or Fri afternoon this week work?

Next week is packed; the only option I can see (given that Monday is probably a busy CTG and alphalisa day) is Fri the 29th, either in the AM or afternoon.

Please let me know if any of those options work for you!

Thx,
Susan

	Please write good / bad / medium for what times work or don't work for you
Fri this week 10 or 11 AM	
Fri this week 1 or 2 PM	
Fri next week 10 or 11 AM	
Fri next week 1 or 2 PM	

Outlook

RE: mystery fun mtg - reschedule?

From Susan Lyman <slyman@initialtx.com>
Date Fri 3/22/2024 9:32 AM
To Esraa Mohamed <emohamed@initialtx.com>; Ilsa Kirby <ikirby@initialtx.com>; Mariwil Wong <mwong@initialtx.com>; Katie Padilla <kpadilla@initialtx.com>; Dani Carino <dcarino@initialtx.com>; Sandy Spurlock <sspurlock@initialtx.com>

Hi again,

Just wanted to say again that if anyone wants, I am here for you guys, to discuss the change, my impressions of Eric (positive) or anything else.

Grab me or send me a mtg invite if you'd like to chat :)

Also, we will STILL have the fun meeting! I really think (hope) it will be something that everyone enjoys – it will not be creepy, but a fun activity that everyone can do in parallel

Can you please let me know what time slots below might work?
I already have all the stuff for the fun meeting, just need a time and people!

	Please write good / bad / medium times (and/or choose a specific interval e.g. 10:30-11:30)
Tues (26th) next week sometime in **10-1** slot (OK to eat lunch during fun activity!)	
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Please let me know if any of those options work for you!

Thx,
Susan

	Please write good / bad / medium for what times work or don't work for you
Fri this week 10 or 11 AM	
Fri this week 1 or 2 PM	
Fri next week 10 or 11 AM	
Fri next week 1 or 2 PM	

EXHIBIT 23

Grace Lee 3/22/24

Sandy told me she heard the CSO and my new boss talking (she was in office next door using computer snd walks are very thin) They were talking about the following with respect to me, her, and IK All of us have been treated to what I think an unbiased observer would call Various forms of harass

Mar 22, 2024 at 9:09 PM

Sandy told me she heard the CSO and my new boss talking

(she was in office next door using computer snd walks are very thin)

They were talking about the following with respect to me, her, and IK

All of us have been treated to what I think an unbiased observer would call

Various forms of harassment

PP was talking to EJ about

1. Fear of litigation

2. A need to "shut them (or it) down"

3. Strategizing about who would be bad cop in the severance offering mtg with me, and who would "stay positive "

EXHIBIT 24

Susan Lyman

Sent - iCloud March 23, 2024 at 8:31 AM

Re: Reorg

To: Susan Lyman

Also note:
I told PPthe "negative venting" was pervasive

He also would have known that from Sandy's various feedback emails and conversations with him

From Sandy's emails to JR and RK saying she felt I was being set up as scapegoat

From Sandy's own situation emails about being mobbed and how the "mob" was negative

Also massive knowledge of MWs pervasive venting, including venting about me

EXHIBIT 25

Sandy Spurlock 3/21/24

...to mention As an (unplanned) part of my short talk with Eric this afternoon Re my reorg mtg comments not being seen as code of...

Mar 21, 2024 at 4:10 PM

Forgot to mention

As an (unplanned) part of my short talk with Eric this afternoon

Re my reorg mtg comments not being seen as code of conduct appropriate

I said that I thought that was ridiculous and also that I felt that I wasn't being treated fairly

I said that of course there are dev areas snd mistakes I've made, like PP giving me fdbk yesterday

as I requested

on anything regarding my scientific or management performance

I also told Eric that I had been vocal about a lot of things in my time here

Scientific and cultural

And I felt it was generally very appropriate remarks and tone

And I had checked with Rachel multiple times (and PY 1-2x) to see if I was overstepping

And I couldn't remember a time when Rachel said yes

I told him I felt like there was a retribution vibe sometimes

Bc PP and PY both say they're welcoming feedback

But Phil's body language and tone often tell a different story

And ditto for PY

EXHIBIT 26

Sandy Spurlock & Ilsa Kirby 3/22/24

...told PP the title change was completely inappropriate IMO

It was not what I signed up for and although I assume it's a research...

iMessage
Mar 22, 2024 at 11:50 AM

I told PP the title change was completely inappropriate IMO

It was not what I signed up for and although I assume it's a research track level it's completely uncool to spring thst on me and also inappropriate

Bc Grace had zero reports and was told to expect jibe but was hired as an AD

Expect none

PO said grace was different her role was expected to have CRO work

I said whst little I've been told about the biomarker role was that it would include CRO work

So even on that slim basis this was inappropriate and seemed like an obvious demotion

In conjunction with the team loss

Intended to push me out

He said no

I says it felt very much like a demotion

Hard to see it any other way

Then as a demotion thst Aldo felt like retribution for speaking up

He said no

He had told Jackie it was research track now bc no reports and told her

Find equivalent level

Grace AD situation didn't occur yo him

I said fine but Jackie, you're HR!! It's your job to think about treating titling and employees in a consistent and fair fashion!!

No reply

I said the divestment of my team felt like retribution

And despite what I was told about flat structure and efficiency thst made no sense

Bc if PP was saying this is bc we have a lot going on and we need one person to oversee all work directly

Then why isn't FW team reporting to Eric??

They do assays and screening?

So if it's truly about efficiency and single point of con tact FW tesm should logically be reporting to Eric

Even though it would be far better for Fred imo to have Eric as a manager

For scientific and managerial development

Bc as I mentioned to you Fred is very smart and nice but he does not have a high performing team as PY said

He has a collection of talented individuals

And 2 of them have told me in recent months they feel isolated, they don't know what's going on, they don't feel included

This is no shade on Fred

But he is not getting the managerial training and support he needs

EXHIBIT 27

Grace Lee 3/28/24

1. I've made it very clear to him and PY and HR many times I don't want my personal device mixed with work 2. WTF!!! I email EJ at 4am thst I'm too sick to come to work Snd 8h later PP is texting MY PERSONAL PHONE to say he wants to have this mtg? When I'd already told EJ as part of 4am email

Mar 28, 2024 at 7:14 PM

1. I've made it very clear to him and PY and HR many times

I don't want my personal device mixed with work

2. WTF!!! I email EJ at 4am thst I'm too sick to come to work

Snd 8h later PP is texting MY PERSONAL PHONE to say he wants to have this mtg?

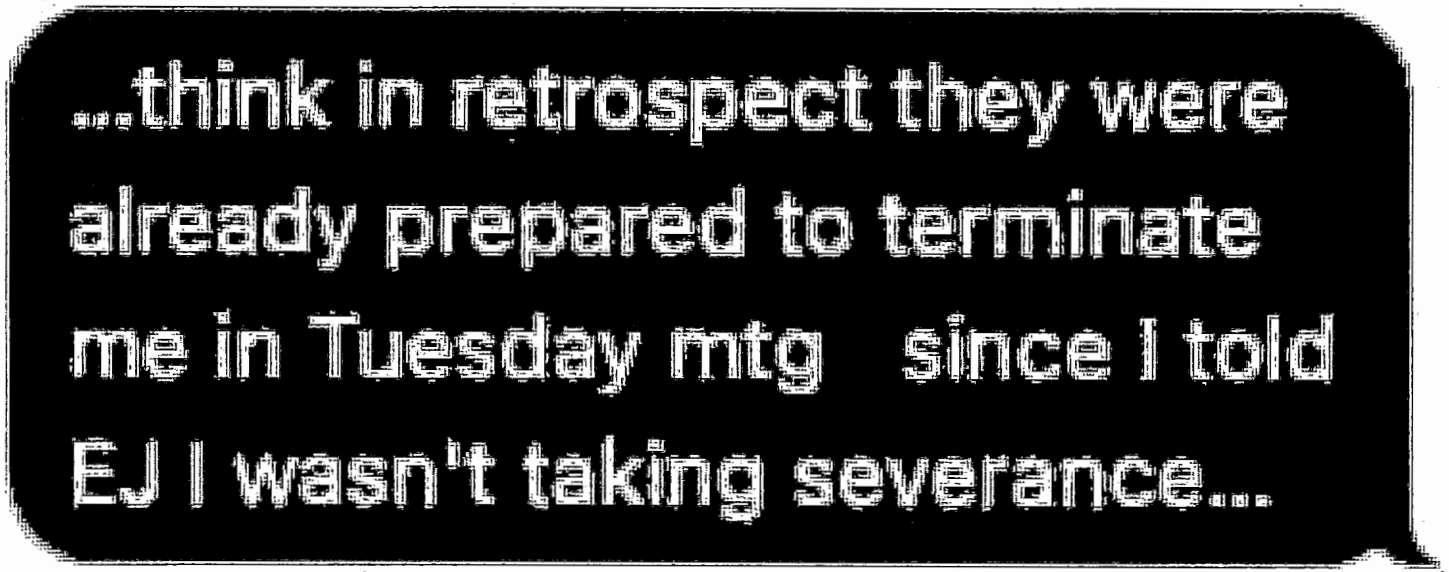
When I'd already told EJ as part of 4am email that I would t be taking the severance pkg??

The supposed entire reason for the mtg???

WTF!!! WTF!!! WTF!!!

EXHIBIT 28

Sandy Spurlock & Ilsa Kirby 4/2/24



Apr 2, 2024 at 10:56 AM

I think in retrospect they were already prepared to terminate me in Tuesday mtg

since I told EJ I wasn't taking severance in Tuesday 4AM email

I sent another email to EJ PP JR Thursday

Asking again for details on position

Since I had Qs:

PP had said biomarker role would potentially have dotted line matrix relationship with some of my team

How will that work ?

Do I advise people on exp plan and analysis? Or only see data when it's published?

EXHIBIT 29

Francesco Calazza 3/29/24

...was just fired this AM On the completely baseless charges that my repeated (2x, no response) Asking about the Dir to Sr Prin Sci title change (with...

iMessage
Mar 29, 2024 at 2:24 PM

I was just fired this AM

On the completely baseless charges that my repeated (2x, no response)

Asking about the Dir to Sr Prin Sci title change (with supporting arguments for why there was significant precedent for Dir title)

Indicated that I was refusing the new role

And I was further told I was not suitable for role or for director title

I strongly disputed that

Saying I'd never had a reply or conversation providing clear basis for title change

Asked: so since ITx hired me as director are you saying ITx msde a mistake?

No reply

Was told my emotional behavior in reorg mtg was not acceptable

This is when CSO had told me he had similar experience and was outraged and had strong emotions

They will find out the hard way that they've made a decision that was totally unmerited

EXHIBIT

D

DocuSign Envelope ID: 9DFA9ABB-A494-409C-9669-2965F6BD07B5

Initial Therapeutics
(617) 294-6790
info@initialtx.com

July 18, 2023

Susan Lyman
sklyman@gmail.com

Revised Offer Letter of Employment

Dear Susan:

I am pleased to offer you a position with Initial Therapeutics, Inc. (the "Company") on the terms and conditions set forth in this offer letter.

1. Duties and Position. Your position with the Company will be Director, Tumor Biology & Biomarker Research. As Director, Tumor Biology and Biomarker Research of the Company, you will report to the Company's Sr. Vice President, Biology, Peiwen Yu or such individual's designee. You will be responsible for providing services that are consistent with your position within the Company and as will be reasonably assigned to you by the Company's Sr. Vice President, Biology or such individual's designee. Within the limits allowed by public health directives, you will work at the Company's headquarters in South San Francisco, California and will travel as business needs may require.

2. Compensation.

a. Upon your commencement of employment with the Company, you will receive an annual base salary of $235,000.00, which will be paid in semi-monthly installments, in accordance with the Company's normal payroll procedures and subject to applicable withholding. You will be eligible to earn an annual target bonus of 20% of your actual annual base salary earnings within a calendar year and based on achievement of performance objectives to be established by the Company. Any bonus for the year ending December 31, 2023, will be pro-rated based on the number of days in such year that you are employed by the Company; provided that you will not be eligible for a bonus for such year if your employment starts after September 30, 2023. As a full-time, salaried, exempt employee you will be expected to work the Company's normal business hours and additional hours as required by your job duties, and you will not be eligible for overtime pay.

b. It is also anticipated that you will be granted an option to purchase 95,000 shares of common stock of the Company subject to the approval of the board of directors of the Company (the "Board"). The final number of shares underlying such option and vesting terms associated with such option will be determined by the Board.

c. You also will be eligible to participate in the employee benefit plans of general applicability to other Company employees at your level, as may be maintained by the Company from time to time. The Company reserves the right to modify salaries and benefits and to terminate benefit plans from time to time as it deems appropriate.

d. Also, as a Company employee, you will be eligible to participate in the Company's time off policy. You acknowledge that your use of time off will be subject to the terms and conditions of the time off policies in place at the Company.

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e. In addition, you will be provided a one-time, $10,000.00 (TEN THOUSAND DOLLAR) sign-on bonus, payable on the date of your first scheduled payroll check. Should you leave or have your employment terminated within the first 12 months, the full amount of the sign-on bonus must be repaid in full immediately prior to separation from the Company. After you have reached 12 months of employment, the sign-on bonus is considered fully earned.

3. At-Will Employment. Your employment with the Company is for no specified period and constitutes at-will employment. As a result, you are free to resign at any time, for any reason or for no reason. Similarly, the Company is free to conclude its employment relationship with you at any time, with or without cause, and with or without notice. We request that, in the event of your resignation, you give the Company at least two weeks' written notice.

4. Additional Agreements.

a. You also agree that, during the term of your employment with the Company, you will not engage in any other employment, occupation, consulting or other business activity related to the business in which the Company is now involved or becomes involved during the term of your employment, nor will you engage in any other activities that conflict with your obligations to the Company. Similarly, you agree not to bring any third-party confidential information to the Company, including that of your former employer(s), and that in performing your duties for the Company you will not in any way utilize any such information.

b. As a condition of your employment with the Company, you are also required to sign and comply with the Company's At-Will Employment, Confidential Information, Invention Assignment and Arbitration Agreement (the "Employment Agreement").

c. As a Company employee, you will be expected to abide by the Company's rules and standards. Specifically, you will be required to sign an acknowledgment that you have read and that you understand the Company's rules of conduct which are included in the Company's handbook, which the Company anticipates will soon be completed and distributed.

d. We also ask that, if you have not already done so, you disclose to the Company any and all agreements relating to your prior employment that may affect your eligibility to be employed by the Company or limit the manner in which you may be employed. It is the Company's understanding that any such agreements will not prevent you from performing the duties of your position and you represent that such is the case.

5. Proof of Legal Right to Work. For purposes of federal immigration law, if requested by the Company, you will be required to provide to the Company documentary evidence of your identity and eligibility for employment in the United States. Such documentation must be provided to us within three (3) business days of your date of hire (if requested by the Company), or the Company's employment relationship with you may be terminated.

6. Other.

a. This offer of employment is conditioned upon and subject to the Company's satisfactory completion of a background investigation.

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b. To accept the Company's offer, please sign and date this offer letter in the space provided below. A duplicate original is enclosed for your records. If you accept our offer, your employment with the Company will commence on August 14, 2023.

c. This offer letter, together with the Employment Agreement, sets forth the terms of your employment with the Company and supersedes any prior representations or agreements, whether written or oral, regarding your employment with the Company, including, but not limited to, any representations made during your recruitment, interviews or pre-employment negotiations.

d. This offer letter may not be modified or amended except by a written agreement signed by an authorized officer of the Company and you.

e. This offer of employment will remain open until, and will terminate if it is not accepted, signed and returned to the Company by July 20, 2023 (or such later date as determined by the Company in its sole discretion). We look forward to your favorable reply and to your working at the Company.

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DocuSign Envelope ID: 9DFA9ABB-A494-409C-9669-2965F6BD07B5

Initial Therapeutics
(617) 294-6790
info@initialtx.com

Sincerely,

DocuSigned by:
Phil Patten
88985D7564E5433...

Phil Patten, Ph.D.
Chief Scientific Officer

Agreed to and accepted:

DocuSigned by:

Signature: _____
1770F87FB59348B...

Printed Name: Susan K. Lyman

Date: 7/18/2023 | 1:20 PM PDT

Enclosures:

- Duplicate Original Offer Letter
- At-Will Employment, Confidential Information, Invention Assignment and Arbitration Agreement